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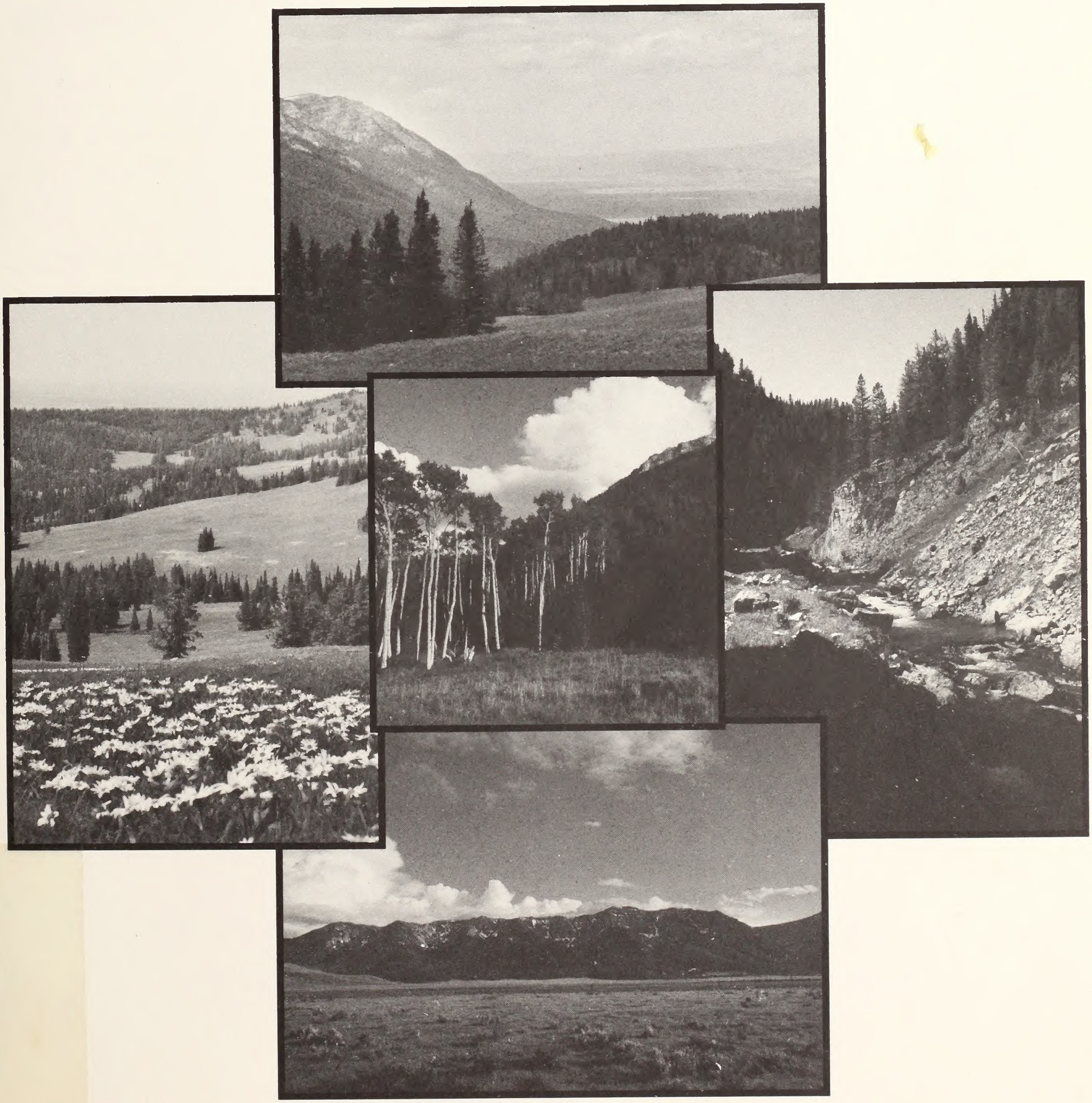
April 1990

CENTENNIAL MOUNTAINS WILDERNESS SUITABILITY STUDY / MFP AMENDMENT / ENVIRONMENTAL IMPACT STATEMENT



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BUREAU OF LAND MANAGEMENT
BUTTE DISTRICT OFFICE
106 North Parkmont
Butte, Montana 59702

IN REPLY TO:

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Dear Reader:

This document examines the suitability of a wilderness designation for the Centennial Mountains. Parts of this area are managed by the Butte District of the BLM, the Fish and Wildlife Service, the Targhee National Forest, the Beaverhead National Forest, the Agriculture Research Service, and the State of Montana. Lands managed by the ARS were added to the document as per public comments and a solicitor's decision which is attached. Lands managed by the State of Montana were added because they are the subject of a land exchange with the BLM and will be incorporated into the wilderness recommendation when acquired. The lands managed by the Fish and Wildlife Service were added in response to public comment.

This EIS was prepared from information contained in the Dillon Resource Area MFP, the Forest Plan for the Beaverhead National Forest, the Land Management Plan for the Targhee National Forest, and the Centennial/Muddy Creek Land Exchange EA/PER. The draft wilderness EIS was issued in February 1984. The public comment period ended June 19, 1987. Three public meetings were held on June 2, 1987 in Helena, MT; June 3, 1987 in Dillon, MT; and June 4, 1987 in Idaho Falls, ID.

James R. Owings
District Manager

1 Attachment
Attach. 1 - Solicitor's Decision

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Memorandum

To: Assistant Director, Land and Renewable Resources (200)
Bureau of Land Management

From: Acting Assistant Solicitor, Land Use & Realty

Subject: Adequacy of the Draft Environmental Impact Statement for the Centennial Mountains Wilderness Study Area

In February 1987, the Bureau of Land Management (BLM) and the Department of Agriculture, Forest Service (FS) submitted for public comment the draft environmental impact statement (DEIS) for the Centennial Mountains Wilderness Study Area. Among those submitting comments were the Wilderness Society and the National Wildlife Federation. Both groups commented that the DEIS was inadequate since it failed to consider for wilderness designation approximately 16,500 acres of land (sheep station land) managed by the Secretary of Agriculture through the Agricultural Research Service (ARS) for sheep research. The sheep station land is, for the most part, completely surrounded by BLM and FS lands which were the subjects of the DEIS and scrutinized for their wilderness designation potential. Because the sheep station land was not studied for possible wilderness designation and not included in the DEIS as part of an alternative to the proposed action, the legal adequacy of the DEIS is now in question.

BACKGROUND

By Executive Order 3767, dated December 19, 1922, the sheep station land was withdrawn for use by the Secretary of Agriculture for experimental sheep grazing.[1] On December 12, 1980, as part of the appropriations act for the Department of the Interior for fiscal year 1981, Congress stated that none of the funds provided to the BLM by the act may be expended to determine the sheep station land's suitability or nonsuitability for wilderness or for any wilderness study area designation.[2] In 1981, Congress withdrew BLM's joint administrative jurisdiction over the sheep station land, granting exclusive administrative jurisdiction to the Secretary of Agriculture.[3]

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[1] Executive Order No. 3767, December 19, 1922.

[2] Appropriations - Department of the Interior and Related Agencies for Fiscal Year, 1981, Pub. L. No. 96-514, 94 Stat. 2957, 2959 (1980).

It is noteworthy that at the time the Secretary of Agriculture was given exclusive administrative jurisdiction over the sheep station land, the FS's final EIS for its RARE II inventory had been completed and preparatory studies by the BLM for the Centennial DEIS had not yet begun.[4] Consequently, both the BLM and FS considered it beyond their authority to include the sheep station land in wilderness studies which have resulted in the Centennial DEIS.

DISCUSSION

The National Environmental Policy Act of 1969 (NEPA) requires an environmental impact statement (EIS) to be prepared for major federal actions significantly affecting the quality of the human environment.[5] Among other requirements, an EIS must discuss alternatives to the proposed major federal action.[6] Congress contemplated that the EIS would constitute environmental source material for its own information and for the information of the executive branch in making relevant decisions.[7] By failing to further explain or define the requirement that an EIS include a discussion of alternatives, Congress has left this issue to the courts for interpretation.

The most respected case discussing the issue of alternatives is NRDC v. Morton, 458 F.2d 827 (D.C. Cir. 1972). In that case, the court analyzed the adequacy of an EIS filed by the Department of the Interior (DOI) with respect to its proposal to sell oil and gas leases to some 80 tracts of outer continental shelf land. The plaintiff's allegations that the EIS was inadequate centered on the contention that, because the discussion of alternatives failed to include any mention of some alternatives and only superficially discussed others, NEPA's requirements were not fulfilled.

Specifically, the plaintiff asserted that a discussion of the alternative of eliminating oil import quotas was necessary, even though such an action was beyond the ability of DOI to implement.

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[3] Pub. L. No. 97-98, 95 Stat. 328 (1981).

[4] See California v. Block, 690 F.2d 753, 758 (9th Cir. 1982) for a discussion of the RARE II evaluation process which resulted in the filing of a final EIS on January 4, 1979.

[5] National Environmental Policy Act of 1969, 42 U.S.C. Sec. 4332(2)(C).

[6] 42 U.S.C. Sec. 4332(2)(C)(iii).

[7] NRDC v. Morton, 458 F.2d 827, 833 (D.C. Cir. 1972).

In holding that the EIS was inadequate, the court noted that where the proposed action was an integral part of a coordinated plan to deal with a broad problem, the range of alternatives that must be evaluated is correspondingly broadened.[8] The court continued by stating that while DOI had no authority to reduce or eliminate oil import quotas, such action was within the authority of Congress and the President, the ultimate decisionmakers. In explaining its holding, the court concluded that NEPA required a discussion of reasonable alternatives, not a "crystal ball" inquiry or consideration of alternatives that are remote from reality.[9] Correspondingly, a reasonable discussion of reasonable alternatives is required. In essence, what is required is information sufficient to permit a reasoned choice of alternatives. Where the alternatives are not within the implementing authority of the responsible agency, reference may be made to the studies of other agencies.

While this is the opinion of the U.S. Circuit Court of Appeals for the District of Columbia, the U.S. Supreme Court has cited it approvingly with the caveat that NEPA cannot serve as the basis for a substantial revision of the Administrative Procedure Act.[10] In Vermont Yankee, the Court held that the concept of "alternatives" is an evolving one, requiring the agency to explore more or fewer alternatives as they become better known and better understood.[11] The Court also noted that the concept of alternatives must be bounded by some notion of feasibility.[12]

Applying this rationale to the Centennial DEIS would probably result in the conclusion that it failed to meet NEPA requirements. First, while it appears that the management of the sheep station land was beyond BLM's jurisdiction, and maybe beyond FS's management jurisdiction, inclusion of that land in an alternative to the proposed action contained in the DEIS is reasonable.[13]

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[8] 458 F.2d at 835.

[9] 458 F.2d at 837. See also Citizens for a better Henderson v. Hodel, 768 F.2d 1051, 1057 (9th Cir. 1985). Cf. Lidstone v. Block, 773 F.2d 1135, 1137 (10th Cir. 1985) stating: "The suggestion of alternatives is within the discretion of the agency subject to the standard review."

[10] See Vermont Yankee Nuclear Corp. v. NRDC, 435 U.S. 519 (1978). See also Administrative Procedure Act, 5 U.S.C. Sec. 553 (1976).

[11] 435 U.S. at 553.

[12] 435 U.S. at 551.

[13] The Federal Land Policy Management Act of 1976, 43 U.S.C. Sec. 1782, requires the Secretary of the Interior to review

(footnote continued)

This is true particularly where the sheep station land is located in the middle of the wilderness study acreage and is central to the functioning of the wilderness watershed. It may be argued that since Congress earlier refused to appropriate funds to allow the BLM to study the wilderness potential of the sheep station land and later removed BLM's joint management jurisdiction over the land, Congress has legislatively objected to the wilderness study or wilderness designation of the land. However, these earlier legislative impediments to the BLM's wilderness study of the sheep station land cannot now be viewed as forbidding a reasonable discussion of its potential as an alternative to the proposed action mentioned in the DEIS.14/

Next, failure to include a discussion of the sheep station land as an alternative in the DEIS deprived the ultimate decision-makers, Congress and the President, of important information. While neither the BLM nor the FS has authority to ultimately designate the sheep station land as wilderness, the ultimate recommendation and authority lies with those who will review the final EIS, the President and Congress.

Last, since the inclusion of a discussion of the sheep land station as an alternative to the proposed action of the DEIS was reasonable, the discussion of that alternative must be reasonable in length and scope. While an extensive wilderness study of the sheep station land may not be necessary, the discussion of this alternative should incorporate by reference any previous studies assessing the land's botanical, wildlife, and geologic factors. This discussion and referenced studies should fulfill NEPA's requirements and advantageously posture BLM's position should the final Centennial EIS become the subject of a court challenge.

Whether the sheep station land alternative must be the subject of a formal supplement to the DEIS is a close question. The Council on Environmental Quality regulations require supplements to a DEIS or EIS where the agency makes substantial changes in the proposed action that are relevant to environmental concerns or where there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed

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(footnote continued from previous page) for their wilderness characteristics, roadless areas of the public lands of 5,000 acres or more. See also the Wilderness Act of 1964, 16 U.S.C. Sec. 1132 (c). Similarly, subsection (b) of the Wilderness Act requires the Secretary of Agriculture to review areas within the national forests with wilderness potential.

14/ *See* *Kilroy v. Ruckelshaus*, 738 F.2d 1448, 1454 (9th Cir. 1984).

action or its impacts.[15] Including a discussion of the sheep station land as an alternative to the proposed action appears not to fulfill these criteria.

Since the purpose of a DEIS is to furnish agency personnel, ultimate decisionmakers, and the public with sufficient information to allow a meaningful and informed consideration of the environmental issues, once the sheep station land alternative has been drafted, some form of public scrutiny must be allowed.[16] Therefore, the final EIS should reflect a discussion of the sheep station land's wilderness potential as an alternative to the DEIS proposed action. The comment letters submitted by the National Wildlife Federation and Wilderness Society should be attached to the final EIS along with the appropriate agency responses. Finally, any comments regarding the sheep station land discussion in the final EIS should be made a part of the record of decision and submitted to the ultimate decisionmakers along with the final EIS and any additional wilderness study information.

If you have any questions or require additional information, please feel free to contact Matt Urie on 343-4036.

A Scott Loveless

A. Scott Loveless

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[15] 40 C.F.R. Sec. 1502.9(c)(1)(i) and (ii) (1986).

[16] _See_ _California v. Block_, 690 F.2d 753, 767, 770 (9th Cir. 1982).

FINAL

CENTENNIAL MOUNTAINS ENVIRONMENTAL IMPACT STATEMENT

U.S. Department of the Interior
Bureau of Land Management

U.S. Department of Agriculture
Forest Service

April 1990

Marvin LeNoue
State Director

ENVIRONMENTAL IMPACT STATEMENT

ABSTRACT: The wilderness environmental impact statement and study considers the suitability of the 92,815-acre Centennial Mountains Study Area for designation as wilderness. A total of 27,691 acres are managed by the Bureau of Land Management and include the Centennial Primitive Area. In addition, 4,474 acres are managed by the Beaverhead National Forest and 42,040 acres by the Targhee National Forest as the Mount Jefferson Roadless Area. Also, 16,650 acres are managed and used for experimental sheep grazing by the Agricultural Research Service, 1,160 acres of Montana state lands that the BLM is acquiring through exchange and 800 acres managed by the Fish and Wildlife Service. The study area is located on either side of the Continental Divide on the border between Montana and Idaho.

This study recommends that 28,688 acres be designated as wilderness and included in the National Wilderness Preservation System. The recommended area includes 21,774 acres of the Centennial Primitive Area managed by the BLM, 4,474 acres of Mount Jefferson Roadless Area managed by the Beaverhead National Forest, and 1,160 acres managed by the State of Montana but scheduled to be transferred to the BLM. The remaining 64,127 acres not recommended for wilderness will be managed as described in the Dillon Resource Area Management Framework Plan and the Land Management Plan for the Targhee National Forest. Various alternatives have been modified to reflect these additions and also to be responsive to public comments regarding a snowmobile corridor in Odell Creek.

For further information:

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Butte District Office
Bureau of Land Management
P.O. Box 3388
Butte, Montana 59702
Phone (406) 494-5059.

SUMMARY

INTRODUCTION

The Environmental Impact Statement for the Centennial Mountains Wilderness Study is a joint effort of the Butte District of the Bureau of Land Management, the Targhee National Forest, and the Beaverhead National Forest. It is prepared in accordance with the National Environmental Policy Act and the regulations in 40 CFR, Parts 1500-1508.

SETTING

The Centennial Mountains lie on the Idaho-Montana border 75 miles north of Idaho Falls, Idaho. The study area covers 92,815 acres in Clark and Fremont counties in Idaho and Beaverhead County in Montana.

The Centennial Study Area includes the Centennial Mountain Primitive Area, which is managed by the Bureau of Land Management. The primitive area provides the spectacular scenery and watershed for the Red Rock Lakes National Wildlife Refuge. The study area also includes the Mt. Jefferson Roadless Area, which is managed by the Targhee and Beaverhead National Forests. It includes two large inholdings totaling 16,650 acres managed by the Department of Agriculture's Agricultural Research Service as a sheep experiment station. These lands were transferred to the Department of Agriculture in the 1981 Appropriations Act. In addition, it includes all or portions of two state school sections managed by the Montana Department of State Lands which the BLM is in the process of acquiring. Also, included are 800 acres managed by the Fish and Wildlife Service that was not included in a wilderness designation but which lies adjacent to BLM lands. As a result of a solicitor's opinion and public comments the original All Wilderness alternative has been changed to incorporate the 16,650-acre Sheep Station into the analysis.

The study area contains a portion of the Continental Divide Trail and is a popular area for snowmobiling, big game hunting, and fishing. Phosphate deposits occur within the study area boundary, and there is low to moderate geologic favorability for oil and gas.

The Odell Creek corridor has been used historically to complete a loop trail for snowmobiling from West Yellowstone to Lakeview and back. Approximately one and one-half miles of this corridor crosses private land. An easement or some other form of agreement with the landowner will be necessary to legalize usage of this route if the corridor is legislated into the wilderness designation.

The Soil Conservation Service (SCS) has maintained a snow course in sections 26 and 27, T. 14 S., R. 2 W. for many years to monitor snow levels. Access by motorized vehicle is one day during the summer to conduct maintenance. Winter monitoring is done on snowshoes or skis. This is a grandfathered use and will be allowed to continue under all alternatives.

Forty-eight percent of the study area has unstable soils. Disturbance of these soils north of the Divide has been linked to sedimentation into the Red Rock Lakes and associated fishery streams.

Ranchers have grazed sheep and cattle in the study area for 100 years. The study area also supports elk, mule deer, moose, and black bear. It contains habitat for threatened and endangered species: grizzly bear, peregrine falcons, wolves, and bald eagles.

The timber consists mainly of Douglas-fir with some alpine fir and spruce. Some of the forests are highly productive.

The study area lies in a remote, rural area where the population density is very low. The major occupations in the surrounding area are ranching, logging, mining, and working in recreation-related businesses. The Fish and Wildlife Service maintains a headquarters for the Red Rocks National Wildlife Refuge at Lakeview just north of the study area.

ISSUES

Public response to an issue survey identified the following issue areas that are analyzed in this environmental impact statement.

Effects on Wilderness Values

Naturalness
Solitude
Opportunities for Primitive Recreation
Special Features

Effects on Recreation Use

Snowmobile Use
Hunting
Access for Motorized Vehicles

Effects on Wildlife Habitat

Fall Security Habitat for Elk
Habitat for Threatened and Endangered Species
Aquatic Habitat Both Onsite an Offsite

Effects on Grazing Use

Effects on Timber Harvest

Effects on Oil and Gas Exploration and Development

Effects on Economic Conditions

ALTERNATIVES INCLUDING THE PROPOSED ACTION

Alternative 1

Alternative 1 is the proposed action. It recommends 28,688 acres for wilderness, including the lands once designated as the Centennial Mountain Primitive Area and the portion of the Mt. Jefferson Roadless Area that lies in Montana and two sections totaling 1,160 acres managed by Montana Department of State Lands. The management of the 64,127 acres not recommended for wilderness is established in current land management plans.

Wilderness values will remain undisturbed on 31 percent of the study area in Montana, be disturbed by development activities on 24 percent in Montana, and generally be maintained on 45 percent in Idaho. Vehicle access will be allowed in the northwest portion in the summer and fall. A snowmobile corridor is recommended through Odell Creek in response to public comment. The Soil Conservation Service snow course will continue as is.

Livestock grazing south of the Continental Divide may increase by 17 percent over the long term. About 10,200 acres of elk habitat will remain undisturbed while 3,000 acres will be available for logging. Conflicts between development activity and grizzly bears will remain low on 28,688 acres in Montana. In addition, conflict will remain low on 25,300 acres of Situation 2 grizzly bear habitat in Idaho that is not recommended for wilderness.

Erosion and slumping may increase on 48 percent of the unstable soils due to development activities. This will not increase sediment levels flowing into the Red Rock Lakes. In addition, 57 percent of the drainage inside the study area that feeds both onsite and offsite wetlands in the Centennial Valley will not be developed. This will enhance fisheries habitats in Montana.

Oil and gas activity on 6,507 acres of existing leases will be restricted in the short term and foregone on 28,688 acres in the long term. About 77 percent of the annual timber harvest will be foregone over the long term. The annual timber harvest on lands not recommended for wilderness could support five jobs. However, 17 potential jobs in timber would not be realized compared to the No Wilderness Alternative.

This alternative would sustain $515,927 of annual income to the local economy from all economic activities. However, an additional $402,861 would not be realized.

Alternative 2

Alternative 2 recommends the entire Centennial Study Area for wilderness. This includes 92,815 acres in both Montana and Idaho.

Wilderness values will remain undisturbed on the entire study area. No recreation vehicle access will be allowed except the one trip per summer by an all-terrain vehicle on the Soil Conservation Service snow course to do maintenance. All current snowmobile use will be eliminated unless a corridor in Odell Creek is specifically provided for in legislation. The Soil Conservation Service snow course will continue as is. Livestock grazing will continue at present levels. Elk and grizzly bear habitat will remain undisturbed. But on the other hand, no wildlife or grizzly bear habitat improvement projects will be undertaken.

Present leases for oil and gas represent a potential impact on 33 percent of unstable soils. However, development is not likely during the life of the leases. Therefore, all the drainage inside the study area that feeds both onsite and offsite wetlands will remain undisturbed. Development activity probably will not occur on unstable soils. But on the other hand, no soil stabilization projects will be allowed. Therefore, only natural slumping and erosion will continue to add sediment into the Red Rock Lakes.

Oil and gas activity on 12,785 acres will be restricted in the short term on existing leases and foregone on 92,815 in the long term. All potential timber harvest in the study area will be foregone over the long term. Seven jobs would be sustained in ranching and recreation compared to the No Wilderness Alternative. The restrictions on logging will result in the loss of 22 potential jobs. All economic activity would sustain $135,572 in annual income to the local economy. However, an additional $783,216 would not be realized.

Alternative 3

Alternative 3 recommends none of the Centennial Study Area for wilderness. The land will be managed according to current land management plans.

Wilderness values generally will be maintained on 67 percent of the study area over the short term, while the wilderness values on the lands north of the Continental Divide and west of Matsingale Creek will be disturbed by development activity. Vehicle access will be allowed in the northwest portion in the summer and fall, and snowmobiles will be allowed through Odell Creek. The Soil Conservation Service snow course will continue as is.

Livestock grazing may increase by 17 percent throughout the study area over the long term. About 13,200 acres of elk habitat will be available for logging. Habitat modification will displace elk and lead to a reduction in hunting in Montana. Conflicts between human activity and grizzly bears may increase on 67,515 acres but will remain low on

25,300 acres in Idaho managed as Situation 2 grizzly bear habitat.

Erosion and slumping may increase on 63 percent of the unstable soils due to development activity. Therefore, there may be an increase in sediment carried into Red Rock Lakes. In addition, 63 percent of the drainage inside the study area that feeds both onsite and offsite wetlands in the Centennial Valley may be developed. This will affect fisheries habitats in Montana due to increased siltation.

Oil and gas exploration will be permitted. If a discovery is made, development will conform to stipulations outlined in current management plans. The suitable timber in the northwest portion will be harvested over the long term. The annual timber harvest could support 22 jobs. In addition, 30 jobs in ranching and recreation would be sustained. All economic activity would sustain $918,788 in annual income to the local economy.

Alternative 4

Alternative 4 recommends 27,859 acres for wilderness. This includes the eastern portion of the study area in Montana and Idaho. The management of the 64,956 acres not recommended for wilderness is established in current land management plans. The boundary has been modified due to public comment to omit those lands in Odell Creek to allow a snowmobile corridor. The Soil Conservation Service snow course will continue as is.

Wilderness values will remain undisturbed on 30 percent of the study area, be disturbed by development on 41 percent in Montana, and generally maintained on 29 percent in Idaho.

Vehicle access will be allowed in the northwest portion in the summer and fall, but 27 percent of the current snowmobile use may be lost.

Livestock grazing may increase by 17 percent over the long term in the portion not recommended wilderness. About 13,200 acres of elk habitat will be available for logging. Habitat modification will displace elk and lead to a reduction in hunting in Montana. Conflicts between human activity and grizzly bears will remain low on 27,859 acres. In addition, 25,300 acres of which 9,817 acres are not recommended as wilderness, will be managed as Situation 2 grizzly bear habitat in Idaho.

Erosion and slumping may increase on 63 percent of the unstable soils due to development activities. This will not increase sediment levels flowing into the Red Rock Lakes. However, 63 percent of the drainage inside the study area that feeds both onsite and offsite wetlands in the Centennial Valley may be developed. This will affect fisheries habitats in Montana due to increased siltation.

Oil and gas activity on 1,166 acres will be restricted in the short term on existing leases and foregone on 27,859 acres in the long term. The suitable timber in the northwest portion will be harvested over the long term. The annual timber harvest could support 22 jobs. In addition, 30 jobs in ranching and recreation would be sustained compared to the No Wilderness Alternative. All economic activity would sustain $917,448 in annual income to the local economy. However, an additional $1,340 in annual income would not be realized.

Alternative 5

Alternative 5 recommends 29,904 acres for wilderness. This includes the western portion of the study area in Montana and Idaho. The management of the 62,911 acres not recommended for wilderness is established in current land management plans.

Wilderness values will remain undisturbed on 32 percent of the study area, be disturbed by development on 18 percent, and be generally maintained on 50 percent. No recreation vehicle access will be allowed in the western portion. The Soil Conservation Service snow course will continue as is.

Livestock grazing may increase by five percent over the long term in the portion not recommended for wilderness. About 13,200 acres of elk habitat will remain undisturbed. Conflicts between human activity and grizzly bears will remain low on 29,904 acres. In addition, 25,300 acres not recommended as wilderness will be managed as Situation 2 grizzly bear habitat in Idaho.

Erosion and slumping may increase on 33 percent of the unstable soils due to development activities. This will not cause increases in sediment levels flowing into Red Rock Lakes. However, 33 percent of the drainage inside the study area that feeds both onsite and offsite wetlands in the Centennial Valley may be developed.

Oil and gas activity on 11,068 acres will be restricted in the short term on existing leases and foregone on 29,904 acres in the long term. The suitable timber in the northwest portion will not be harvested. The restrictions on logging will result in the loss of 22 potential jobs. However, 30 jobs in ranching and recreation would be sustained as compared to the No Wilderness Alternative. All economic activity would sustain $397,784 in annual income to the local economy. However, an additional $521,004 in annual income would not be realized.

Alternative 6

Alternative 6 recommends 58,363 acres for wilderness. This includes the areas recommended in both Alternatives 4 and 5. The management of the 34,452 acres not recommended for wilderness is established in current land management plans.

Wilderness values will remain undisturbed on 64 percent of the study area, be disturbed by development on 18 percent and generally maintained on 18 percent. No recreation vehicle access will be allowed in the northwest portion, and 60 percent of the snowmobile use may be lost. The Soil Conservation Service snow course will continue as is.

Livestock grazing may increase by 4 percent over the long term in the portion not recommended for wilderness. About 13,200 acres of elk habitat will remain undisturbed. Conflicts between human activity and grizzly bears will remain low on 58,363 acres. In addition, 25,300 acres of which 9,817 acres are not recommended wilderness, will be managed as Situation 2 grizzly bear habitat in Idaho.

Present leases for oil and gas represent a potential impact on 33 percent of unstable soils. However, development is not likely during the life of the leases. Therefore, all of the drainage inside the study area that feeds onsite and offsite wetlands will remain undisturbed. Development activity probably will not occur on unstable soils. Natural slumping and erosion will continue to add sediment into Red Rock Lakes at existing rates.

Oil and gas activity on 12,234 acres will be restricted in the short term on existing leases and foregone on 58,363 acres in the long term. The suitable timber in the northwest portion will not be harvested. Thirty jobs would be sustained in ranching and recreation compared to the No Wilderness Alternative. The restrictions on logging will result in the loss of 22 potential jobs. All economic activity would sustain $388,582 in annual income to the local economy. However, an additional $530,206 in annual income would not be realized.

Alternative 7

Alternative 7 recommends 19,867 acres for wilderness. This includes most of the Red Rock Lakes drainage within the study area. The management of the 72,948 acres not recommended for wilderness is established in current land management plans.

Wilderness values will remain undisturbed on 22 percent of the study area in Montana, be disturbed by development activities on 33 percent in Montana, and generally maintained on 45 percent in Idaho. Vehicle access will be allowed in the northwest portion in the summer and fall, but 27 percent of the snowmobile use may be lost. The Soil Conservation Service snow course will continue as is.

Livestock grazing may increase by 17 percent over the long term in the portion not recommended for wilderness. About 11,700 acres of elk habitat will be available for logging, while 1,500 acres will be protected. Habitat modification will displace elk and lead to a reduction in hunting in Montana. Conflicts between human activity and grizzly bears will remain low on 19,867 acres. In addition, 25,300 acres in Idaho, not recommended as wilderness, will be managed as Situation 2 grizzly bear habitat.

Erosion and slumping may increase on 61 percent of the unstable soils due to development activities. This will not increase sediment levels flowing into the Red Rock Lakes. However, 60 percent of the drainage inside the study area that feeds offsite and onsite wetlands in the Centennial Valley may be developed. This will affect fisheries habitat in Montana due to increased siltation.

Oil and gas activity on 3,039 acres will be restricted in the short term on existing leases and foregone on 19,867 acres in the long term. About 11 percent of the annual timber production will be foregone over the long term. The annual timber harvest on lands not recommended could support 20 jobs. However, two potential jobs in timber would not be realized compared to the No Wilderness Alternative. All economic activity would sustain $857,468 of annual income to the local economy. However, an additional $61,320 would not be realized.

Alternative 8

Alternative 8 recommends 42,040 acres for wilderness. This includes only the Mt. Jefferson Roadless Area in the Targhee National Forest in Idaho. The management of the 50,775 acres not recommended for wilderness is established in current land management plans.

Wilderness values will remain undisturbed on 45 percent of the study area, generally maintained on 23 percent, but be disturbed by development activities on 32 percent in Montana. Vehicle access will be allowed in the northwest portion in the summer and fall, but 70 percent of the snowmobile use may be lost. The Soil Conservation Service snow course will continue as is.

Livestock grazing may increase by four percent over the long term. About 13,200 acres of elk habitat will be available for logging. Habitat modification will displace elk and lead to a reduction in hunting in Montana. In Idaho, conflicts between human activity and grizzly bears will remain low on 42,040 acres of which 25,300 acres are currently maintained as Situation 2 grizzly bear habitat.

Erosion and slumping may increase on 51 percent of the unstable soils due to development activity. Also, 63 percent of the drainage inside the study area that feeds the onsite and offsite wetlands in the Centennial Valley may be developed. This will affect fisheries habitat in Montana due to increased siltation.

Oil and gas activity on 2,731 acres will be restricted in the short term on existing leases and foregone on 42,040 acres in the long term. The suitable timber in the northwest portion will be harvested in the long term. The annual timber harvest could support 22 jobs. In addition, 30 jobs in ranching and recreation would be sustained compared to the No Wilderness Alternative. All economic activity would sustain $906,766 of annual income. However, an additional $12,022 in annual income would not be realized.

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CHAPTER 1
INTRODUCTION

PURPOSE AND NEED

The purpose of this final environmental impact statement is to document the environmental effects which are likely to occur with implementation of the proposed action or other alternatives. The basic focus of the analysis is on effects of either designating the area as wilderness (under provisions of the Wilderness Act of 1964), or on denying such designation and managing the area for other values and uses as described in the Dillon Resource Area Management Framework Plan (USDI, BLM 1979b).

The Centennial Mountains Wilderness Study and Environmental Impact Statement is prepared in compliance with Section 603 of the Federal Land Policy and Management Act of October 21, 1976. This law directed the Bureau of Land Management (BLM) to inventory, study, and then report to Congress through the Secretary of the Interior and the President, the suitability of certain public lands for inclusion in the National Wilderness Preservation System. The act further required the BLM to report to the President, through the Secretary of the Interior, the wilderness suitability of the BLM's natural or primitive areas designated prior to November 1, 1975. The Centennial Mountains falls under this latter provision and is considered an Instant Study Area.

This document completes the wilderness study requirements for 42 areas (39 wilderness study areas and 3 instant study areas) managed by the BLM in Montana. From this point on, the Federal Land Policy and Management Act requires the Secretary of the Interior to report the recommendations to the President by October 21, 1991. The President has until October 21, 1993 to send the recommendations to Congress. Congress has final authority in the designation of wilderness areas.

This study is also in response to the Forest Service's efforts to administratively review the remainder of forest lands not evaluated for wilderness suitability under the Wilderness Act of September 3, 1964. The Forest Service reviewed its lands under the first and second Roadless Area Review and Evaluation programs. In September 1983, the National Forest Management Act regulations were amended to require that forest plans reevaluate for wilderness suitability the roadless lands included within the plan boundaries. The Forest Service is reevaluating the Mt. Jefferson Roadless Area in cooperation with the BLM because the roadless area is contiguous with the BLM Centennial Primitive Area and other roadless public lands.

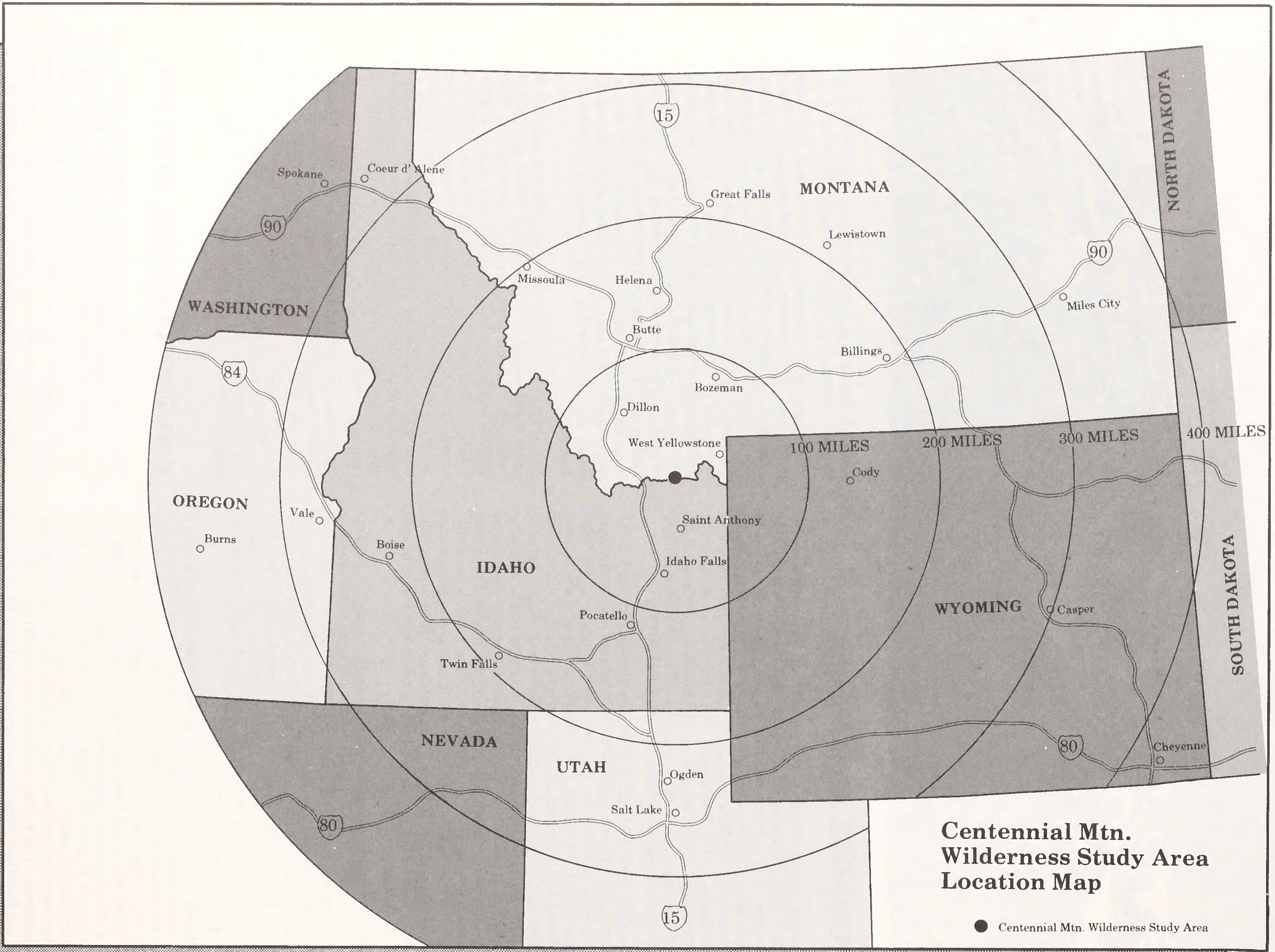
There are four objectives in developing this wilderness study and environmental impact statement. The first is determining which portions, if any, of the Centennial Study Area should be recommended to Congress for wilderness classification. The second is to assess and document the environmental impacts of the proposed action and other alternatives. The third objective is to ensure that the affected agencies and the public have a full opportunity to participate in the development of the wilderness study and environmental impact statement. The fourth objective is to ensure that agency recommendations are cooperatively developed and documented, and when differences exist, the rationale for agency recommendations is fully disclosed.

The study was conducted in accordance with BLM planning regulations (43 CFR 1601) which provides for the issuance of national and procedural guidance. The BLM's Wilderness Study Policy serves this purpose. The policy establishes procedures to ensure that suitability recommendations are based on full consideration of all multiple resource values of public lands and consistent with established national policy, and that all interested and affected members of the public and state and local governments are made aware of the study and given adequate opportunity to comment and be involved in the study process.

The study is also in accordance with the Forest Service Forest Land and Resource Management Planning Regulations (36 CFR 219) as amended. These regulations provide for the evaluation of roadless areas for wilderness suitability. They also provide for national consistency, full public participation, and a consideration of significant resource issues to arrive at a recommendation for wilderness.

ENVIRONMENTAL SETTING

The Centennial Mountains are located in Beaverhead County, Montana, and Clark and Fremont Counties, Idaho (see Location Map). Administration of the area under wilderness study is shared between the Targhee National Forest, Island Park and Dubois Districts; the Beaverhead National Forest, Madison District; the Butte District of the Bureau of Land Management, Dillon Resource Area, the



Centennial Mtn. Wilderness Study Area Location Map

● Centennial Mtn. Wilderness Study Area

MONTANA
IDAHO
WYOMING
OREGON
WASHINGTON
NEVADA
UTAH
NORTH DAKOTA
SOUTH DAKOTA
100 MILES
200 MILES
300 MILES
400 MILES
Spokane
Coeur d' Alene
Great Falls
Lewistown
Missoula
Helena
Butte
Miles City
Billings
Bozeman
Dillon
West Yellowstone
Cody
Saint Anthony
Idaho Falls
Vale
Burns
Boise
Pocatello
Twin Falls
Casper
Cheyenne
Ogden
Salt Lake
15
90
84
80

Montana Department of State Lands, and the Agricultural Research Service. The study area includes a 30-mile segment of the Continental Divide which overlooks the Centennial Valley to the north and the Snake River plain to the south. The study area is bounded on the north by privately-owned lands and portions of the Red Rock Lakes National Wildlife Refuge which is largely a designated wilderness. On the south and east other Targhee National Forest lands form the boundary. On the west, other BLM-managed lands abut the border. The study area contains 92,815 acres.

Elevations in the study area range from 6,800 feet on the east to over 9,800 feet at the mountain summits. The northern face of the range rises nearly 3,000 feet in less than a mile. The climate is harsh and cold with considerable snowfall. Lower slopes are covered with Douglas-fir with scattered stands of lodgepole pine, Englemann spruce, alpine fir, and quaking aspen. As elevation increases, there is a vegetative change from mature forest to large alpine meadows with scattered stands of subalpine fir, spruce, and whitebark pine.

PLANNING PROCESS

The BLM portion of the Centennial Mountains under wilderness study is within lands included in the Dillon Management Framework Plan (USDI, BLM 1979b). This plan makes coordinated land use decisions for all resources and establishes objectives for each resource and the activities that support it. Conflicts between resources were reconciled through analysis and discussion, including public comment. This plan contains specific resource recommendations, decisions, and trade-offs based on particular resource conditions and was finalized in 1979. Comments from the public were sought for the updated plan at public meetings held in 1977 and 1978.

The Management Framework Plan was completed prior to completion of the wilderness inventory and requires amending to include this wilderness study and subsequent management decisions determined by Congress. This Environmental Impact Statement, in conjunction with Congressional action, will serve to amend the plan.

The Targhee National Forest roadless area in Mt. Jefferson #15962 was examined in Appendix C of the 1985 *Land Management Plan for the Targhee National Forest and Final Environmental Impact Statement* (USDA, FS 1985b). A 1984 supplement to the Land Management Plan reevaluated in a site-specific manner both this area and the other roadless areas on the Targhee. The land management plan directs the Targhee to study the area for wilderness suitability in cooperation with the BLM and Beaverhead National Forest.

The Beaverhead National Forest portion of the Mt. Jefferson Roadless Area, numbered 1-962, was considered for wilderness in the *Forest Plan for the Beaverhead National Forest and Final Environmental Impact Statement* (USDI, FS 1986b) and the effects of wilderness designation were examined in Appendix B of the Final Environmental Impact Statement that accompanied the plan. In all documents, both the Beaverhead and Targhee National Forests prescribed management that will maintain wilderness characteristics until Congress acts on wilderness suitability for the Centennial Study Area.

This Environmental Impact Statement in conjunction with Congressional action will serve to amend the National Forest Plans.

MANAGEMENT HISTORY OF THE AREA

In March 1965, a Memorandum of Understanding was signed between the BLM and the Agricultural Research Service establishing dual management of the public lands in the Centennials.

In October 1973, portions of the Centennial Mountains were studied by the Forest Service under RARE I. The area was recommended for nonwilderness use.

In August 1975, 21,985 acres of the BLM portion of the Centennial Mountains were administratively designated a Primitive Area.

In October 1976, Congress passed the Federal Land Policy and Management Act which mandated the BLM to study all Primitive and Natural Areas for wilderness suitability under Section 603.

In January 1978, Montana Wilderness Association petitioned to revoke the Agricultural Research Service withdrawal.

In January 1978, the BLM requested revocation of the Agricultural Research Service withdrawal.

In January 1978, an appeal was upheld by the Chief of the Forest Service when he directed the study of roadless Targhee National Forest lands contiguous to the BLM Centennial Study Area.

In July 1978, 6,700 acres managed by the Targhee National Forest were recommended for further planning in the Land Management Plan for Island Park Planning Unit and carried into RARE II.

In January 1980, the Department of Interior Appropriations Act of Fiscal Year 1981 disallowed use of budget funding for studying for wilderness that portion of the Centennials managed by the Agricultural Research Service.

In December 1981, the Sheep Station was removed from dual administration of Department of Agriculture and Department of Interior. The area was released from BLM wilderness study.

In July 1982, the results of Intensive Inventories of the Centennial Study Area were released to the public. A 30-day public comment period followed.

In January 1985, the results of the final decision on Intensive Inventory results and Notice of Interest to Study were released to the public in the Federal Register.

In February 1987, the Draft Environmental Impact Statement for the Centennial Mountains Wilderness Study was released for public review.

On June 2, 3, and 4, 1987, formal hearings took place in Helena and Dillon, Montana and Idaho Falls, Idaho.

In September 1988, 1,160 acres of Montana State Lands adjacent to the wilderness study area boundaries were acquired by the Bureau of Land Management and added to the wilderness study.

ISSUE IDENTIFICATION (SCOPING)

Throughout the inventory stage of the wilderness evaluation of the Centennial Mountains, the public had opportunities to attend meetings, open houses, or other informal meetings in addition to letting BLM know of their concerns in writing. From this open forum, a number of issues were generated and were sent to the public in February 1985 (see Appendix A). The issues discussed were:

- Minerals and Energy
- Range
- Snowmobile Use
- Timber
- Elk
- Grizzly Bear
- Watershed
- Wilderness
- Economics
- Boundaries

Public comment on the issues brochure aided the interdisciplinary team in determining which issues were significant and consequently to be analyzed in the Environmental Impact Statement. The ten issues identified in the scoping process were expanded to fourteen issues for analysis of impacts. The wilderness and boundaries issues are analyzed under wilderness values. The grizzly bear issue is expanded to include other threatened and endangered species. The watershed issue is narrowed to a discussion of unstable soils and, onsite and offsite aquatic habitat. The use and location of the Continental Divide trail will not be affected by the proposed action or any of the alternatives.

The issues analyzed in this document evaluate the effect of wilderness designation on:

- Wilderness Values
  - Naturalness
  - Solitude
  - Opportunities for Primitive Recreation
  - Special Features
- Recreation Use
  - Snowmobile Use
  - Hunting
  - Access for Motorized Vehicles
- Wildlife Habitat
  - Fall Security Habitat for Elk
  - Habitat for Threatened and Endangered Species
  - Aquatic Habitat Both Onsite and Offsite
- Grazing Use
- Timber Harvest
- Oil and Gas Development
- Economic Conditions

The following issue was identified through public hearings and comments on the draft EIS. It was not subjected to a detailed analysis in the Draft Environmental Impact Statement and is set aside as discussed below.

Issues Not Selected for Detailed Analysis

The soils issue was dropped as there are no soils management actions proposed thus no need for further analysis. The minerals issue was dropped because the phosphate leases in the Centennials are being terminated.

Impacts on State Inholdings

Two tracts totaling 1,160 acres managed by Montana Department of State Lands are surrounded by or adjacent to lands identified for designation and would contribute to the boundary delineation of the proposed action. Sections 36 in each of T14S, R1&2W are scheduled for title transfer in the future. Development potential and wilderness attributes on each of these tracts are the same as the public land surrounding or adjacent to each of them. This issue is dropped from further consideration because the uses on these lands would not change as a result of designation or nondesignation and they should be included in whatever the decision is for the adjacent lands.

THE ALTERNATIVES SELECTED

The interdisciplinary team formulated the following eight alternatives after their review of public comment, identification of resource values, evaluation of existing and potential resource conflicts, and application of the wilderness planning criteria and quality standards.

Alternative 1 Proposed Action. A total of 28,688 acres (23,054 acres managed by the BLM, 4,474 acres managed by the Beaverhead National Forest, and 1,160 acres previously managed by Montana Department of State Lands) would be recommended for wilderness. The remaining 64,127 acres would be recommended nonsuitable.

Alternative 2. All 92,815 acres would be recommended for wilderness designation.

Alternative 3 No Action. No acreage would be recommended for wilderness designation.

Alternative 4. A total of 27,859 acres (7,302 acres managed by the BLM, 15,483 acres managed by the Targhee National Forest, 4,474 acres managed by the Beaverhead National Forest, and 600 acres previously managed by Montana Department of State Lands) north and south of the Continental Divide and east of Section 36, T. 14 S., R. 2 W., would be recommended for wilderness while 64,956 acres would be recommended nonsuitable.

Alternative 5. A total of 29,904 acres (20,349 acres managed by the BLM north of the Continental Divide and west of Section 36, T14S, R2W and 9,555 acres managed by the Targhee National Forest south of the Divide would be recommended for wilderness while 62,911 acres would be recommended nonsuitable.

Alternative 6. A total of 58,363 acres managed by the BLM, Targhee National Forest, Beaverhead National Forest, and Montana Department of State Lands north and south of the Continental Divide as described above in Alternative 4 and 5 would be recommended for wilderness while 34,452 acres would be recommended nonsuitable.

Alternative 7. A total of 19,867 acres (14,233 acres managed by the BLM, 4,474 acres managed by the Beaverhead National Forest, and 1,160 acres previously managed by Montana Department of State Lands) north of the Continental Divide and representing the major portions of the watershed of the Red Rock Lakes National Wildlife Refuge would be recommended for wilderness while 72,948 acres would be recommended nonsuitable.

Alternative 8. A total of 42,040 acres managed by the Targhee National Forest south of the Continental Divide would be recommended for wilderness while 50,775 acres to the north would be recommended nonsuitable.

These eight alternatives will provide a range of possible wilderness recommendations. The proposed action is BLM's and the Forest Service's management recommendation at the conclusion of the planning process.

There were several alternatives not selected for detailed analysis. They are explained on in Chapter 2.

CHAPTER 2
DESCRIPTION OF THE ALTERNATIVES

INTRODUCTION

Chapter 2 describes the proposed action and seven other alternatives for the Centennial Mountains Wilderness Study Area. In addition, Table 2-3 at the end of this chapter compares the environmental impacts that would result from implementation of the proposed action or any of the alternatives.

This document analyzes a wide range of wilderness designation alternatives and includes an All Wilderness and a No Wilderness/No Action alternative.

> The All Wilderness Alternative (Alternative 2) analyzes the impact of designating the entire study area as wilderness. If Congress selects this alternative, the study area would be managed under the BLM's and Forest Service's Wilderness Management Policies.
>
> The No Wilderness/No Action Alternative (Alternative 3) analyzes the impacts if no part of the study area is designated as wilderness. Under the No Wilderness Alternative, the land would be managed according to existing management plans.

Six partial wilderness alternatives will also be considered. Partial wilderness alternatives have portions of the study area recommended for wilderness designation and portions available for uses other than wilderness. Three guidelines were used to arrive at the partial wilderness alternatives: (1) to resolve conflicts between wilderness and other resource uses, (2) to improve the agencies' ability to protect the wilderness resource in the long term, and (3) to ensure examination of a full range of alternatives. Again, these alternatives represent the full range of reasonable alternatives as determined by the scoping process.

DESCRIPTION OF ALTERNATIVES, INCLUDING THE PROPOSED ACTION

The proposed action and seven alternatives were identified during the scoping and planning process. The eight alternatives analyzed in this document are described below and summarized in Table 2-1. The direction which appears after each alternative description is a summary of existing and projected management plan guidance and outlines what would occur if that particular alternative were chosen.

Under each alternative except the All Wilderness Alternative, it is recommended, in response to public comments, that a snowmobile corridor be provided in Odell Creek from December 1 through April 30 to complete the loop trail. If this is done, approximately one and one-half miles of easement will be necessary across private land at the mouth of Odell Creek. In addition, it will be necessary for the Sheep Station to agree to snowmobiles crossing their lands.

The following assumptions were utilized in projecting the management actions for each of the alternatives:

> Any portion of the study area not designated as wilderness by Congress will be managed as outlined in the respective management plans.
>
> Study area lands in the Beaverhead National Forest, if not designated wilderness, will be managed as described in the *Forest Plan*(USDA, FS 1986b).
>
> Study area lands in the Targhee National Forest, if not designated wilderness, will be managed as described in the *Land Management Plan for the Targhee National Forest* (USDA, FS 1985b).
>
> Study area lands in the Dillon Resource Area of the BLM, if not designated wilderness, will be managed as described in the *Management Framework Plan* (USDI, BLM 1979).
>
> Study area lands under jurisdiction of the Department of Agriculture's Agricultural Research Service, if not designated wilderness, will be managed according to their management prescription.
>
> Study area lands under Department of Interior's Fish and Wildlife Service, if not designated wilderness would be managed according to their management prescription.

TABLE 2-1

SUMMARY OF PROPOSED ACTION AND ALTERNATIVES FOR CENTENNIAL MOUNTAINS WILDERNESS

Alternative Number	Alternative Name	Acres of BLM	Acres of BNF	Acres of TNF	Acres of ARS	Acres of MT	Acres of FWS	Total Number of Acres Recommended for Wilderness
1.	Proposed Action	23,054	4,474	0	0	1,160	0	28,688
2.	All Wilderness	27,691	4,474	42,040	16,650	1,160	800	92,815
3.	No Wilderness — No Action	0	0	0	0	0	0	0
4.	Partial Wilderness	7,302	4,474	15,483	0	600	0	27,859
5.	Partial Wilderness	20,349	0	9,555	0	0	0	29,904
6.	Partial Wilderness	27,691	4,474	25,038	0	1,160	0	58,363
7.	Partial Wilderness	14,233	4,474	0	0	1,160	0	19,867
8.	Partial Wilderness	0	0	43,040	0	0	0	42,040

ACRES NOT RECOMMENDED COMPARED TO THE ALL-WILDERNESS ALTERNATIVE
FOR THE CENTENNIAL MOUNTAINS WILDERNESS

Alternative Number	Alternative Name	Acres of BLM	Acres of BNF	Acres of TNF	Acres of ARS	Acres of MT	Acres of FWS	Total Number of Acres Recommended for Wilderness
1.	Proposed Action	4,637	0	42,040	16,650	40	800	64,127
2.	All Wilderness	0	0	0	0	0	0	0
3.	No Wilderness — No Action	27,691	4,474	42,040	16,650	1,160	800	92,815
4.	Partial Wilderness	20,389	0	26,557	16,650	560	800	64,956
5.	Partial Wilderness	7,342	4,474	32,485	16,650	1,160	800	62,911
6.	Partial Wilderness	0	0	17,002	16,650	0	800	34,452
7.	Partial Wilderness	13,458	0	42,040	16,650	0	800	72,948
8.	Partial Wilderness	27,691	4,474	0	16,650	1,160	800	50,775

Alternative 1: Proposed Action

Wilderness Recommendation (28,688 Acres-Suitable, 64,127 Acres-Nonsuitable)

Lands recommended as suitable for wilderness designation in Alternative 1 cover 21,774 acres of the original BLM Primitive Area plus 1,280 acres acquired from the state and 4,474 acres of the Beaverhead National Forest, and 1,160 acres of Montana State lands if acquired by BLM. All 28,688 acres are north of the Continental Divide in Montana (see Alternative 1 Map). Private land and the Red Rock Lakes National Wildlife Refuge border the study area to the north. The Sheep Station, along with national forest lands recommended for nonwilderness, form the boundary to the east and south. To the west, nonwilderness public lands form the border.

This alternative recommends most of the north-facing mountain range which overlooks the Centennial Valley for wilderness designation but excludes some of the timbered lands on the west end of the study area and the 16,650 acres administered by the Agricultural Research Service and all of the study area in the Targhee National Forest. A total of 64,127 acres are not recommended for wilderness.

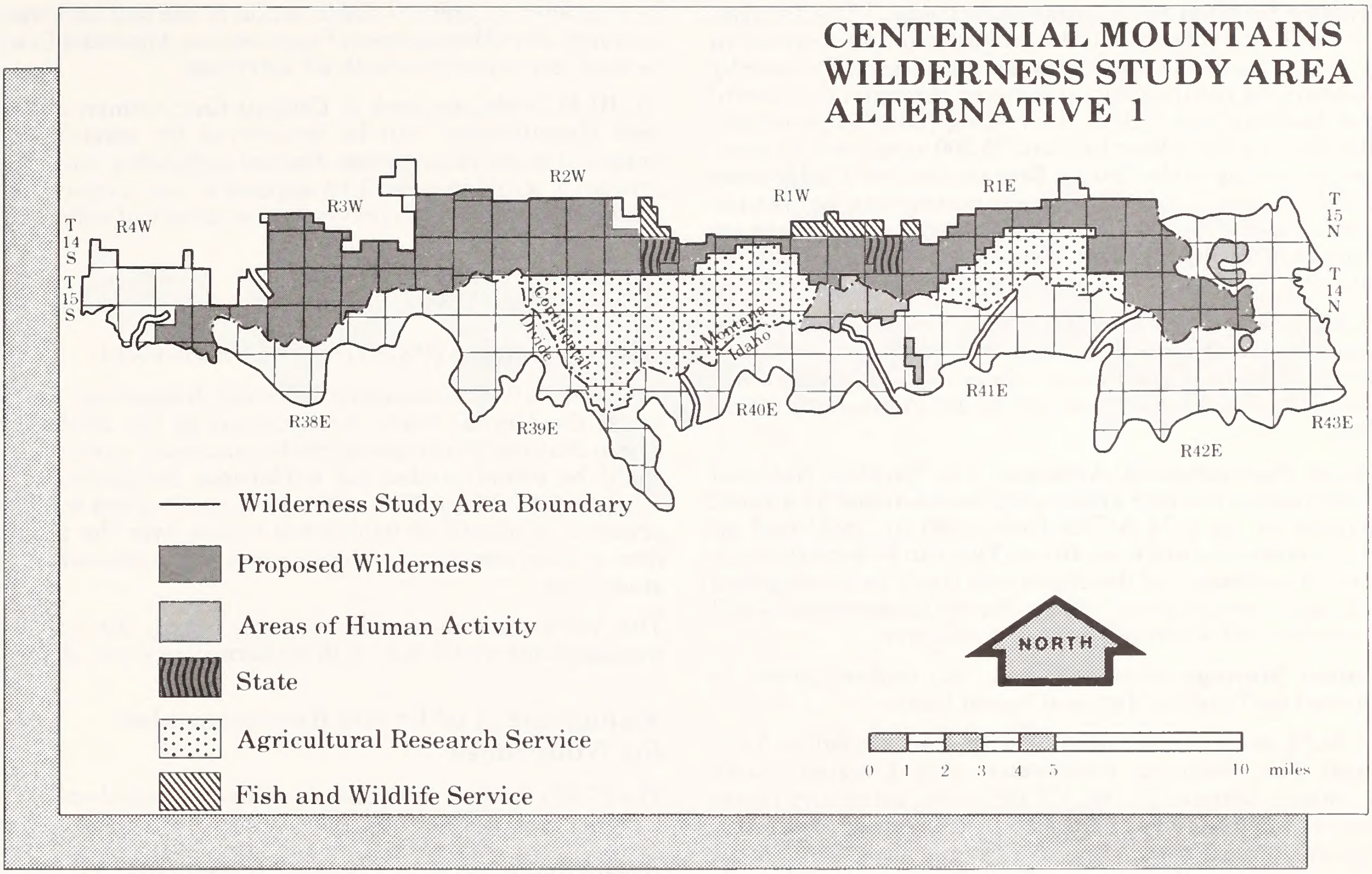
The following summary by resource details what direction management would take if this alternative were selected. Management direction for portions of the alternative recommended for wilderness are displayed separately from management direction for portions not recommended for wilderness.

Management of Lands Recommended for Wilderness

The 23,054 acres of public lands, plus the 1,160 acres of Montana State land that BLM is in the process of acquiring, will be managed under the BLM's Wilderness Management Policy, and the 4,474 acres managed by the Beaverhead will be administered under the Forest Service Wilderness Policy.

Recreation Management Actions. The Odell Creek haul road has been used for many years as a loop trail from Island Park to the Yellowstone National Park by snowmobilers with Lakeview often serving as an overnight destination point. Odell Creek would remain open as a snowmobile corridor from December 1 through April 30. The corridor passes through one-fourth mile of lands recommended for wilderness to complete the loop trail. The seasonal use of the corridor is approximately 1,600 snowmobiling visitor days. Other off-road vehicle use will continue to be prohibited on designated BLM lands. No recreation facilities are planned. A Memorandum of Understanding with stipulations to protect sheep grazing on the Sheep Station will be developed for use of the Continental Divide trail on the Sheep Station. Approximately six miles of trail will be on or immediately adjacent to the area recommended for wilderness. Hunting will likely continue in the current nonmotorized mode.

Wildlife Habitat Management Actions. Under this alternative, management objectives would preclude 10,200 acres of elk fall and migrational habitat from logging. This timber is located west of Matsingale Creek on BLM land.


CENTENNIAL MOUNTAINS
WILDERNESS STUDY AREA
ALTERNATIVE 1
R4W
R3W
R2W
R1W
R1E
T 14 S
T 15 S
T 15 N
T 14 N
Continental Divide
Montana
Idaho
R38E
R39E
R40E
R41E
R42E
R43E
Wilderness Study Area Boundary
Proposed Wilderness
Areas of Human Activity
State
Agricultural Research Service
Fish and Wildlife Service
NORTH
0 1 2 3 4 5 10 miles

Range Management Actions. Livestock grazing will continue at current levels (850 AUMs) as identified in the Dillon MFP. Construction of one-half mile of fence in the Price Peet allotment will occur without the use of motorized equipment. No other range improvements are planned.

Timber Management Actions. Timber harvest will be precluded on the 10,200 suitable acres recommended for wilderness. (See Table 4-2.)

Mineral and Energy Management Actions. No new mineral claims or mineral leases will be allowed on the lands designated wilderness. Existing oil and gas leases covering 6,507 acres could be explored until they expire under stipulations designed to protect the wilderness resource. Development of 16 lode claims for decorative building stone would require a mineral examination by the Forest Service to determine if the claims are valid within the meaning of the Mining Law. If the claims were found to be valid, the operator would be allowed to impair wilderness values only as provided for in Section 4d of the Wilderness Act. Mining action predominately consists of removing slag surface rock. A small tractor may push material around to loosen it up. Access would not be required. A validity exam would be conducted after the area is designated wilderness. If the claims were found to be invalid, the claims would be contested and removed.

Unstable Soils Management Actions. No projects for soil stabilization will occur. Water quality and sediment levels will be influenced only by natural events.

Management of Lands Not Recommended for Wilderness

The 42,040 acres managed by the Targhee and not recommended for wilderness will be administered according to the *Land Management Plan for the Targhee National Forest* (USDA, FS 1985b). The 4,637 acres of BLM land not recommended for wilderness will be managed according to the *Dillon Resource Area Management Framework Plan* (USDI, BLM 1979).

Recreation Management Actions. No developed sites will be constructed. Recreation opportunities will be provided in the semiprimitive, nonmotorized Recreation Opportunity Spectrum category (see Appendix N), which allows essentially no development. Snowmobiling will be allowed in winter. The Keg Springs and East Dry Creek roads from the south will remain open with no restrictions on amount of use. Keg Spring Road averages an estimated six vehicles per day of use due to the popularity of Blair Lake. East Dry Creek is used by about three vehicles per day. During hunting season the use increases about five times the normal use. This totals about 975 vehicle days per year. Willow Creek and Taylor Creek roads are gated allowing authorized use only.

On BLM lands, vehicle access will be managed according to the Interagency Visitor Map for Southwest Montana. Currently 3,860 acres are open to vehicle access from May 1 through December 1. It is estimated at about 100 vehicle days per year.

Wildlife Habitat Management Actions. The Targhee National Forest lands will be managed for an increase in elk population and a small increase in elk security cover by maintaining the integrity of the area through reduction of road building and timber harvesting (none is projected). Situation 2 grizzly bear habitat (25,300 acres) will be managed according to the *Grizzly Bear Guidelines*. Under these guideline, grizzly bear use is an important use, but not the primary use of the area (USDI, FWS 1986). No projects are planned in the near future to improve wildlife and fisheries habitat.

On BLM lands, peregrine falcons will be reintroduced in cooperation with the Peregrine Falcon Recovery Team. Sites will be in rugged areas where no development will take place. The specific sites will be determined at a future date.

Range Management Actions. On Targhee National Forest lands, livestock grazing will be managed for a small increase in use (275 AUMs from 1,590 to 1,885) and an improvement in range condition. This can be done through grazing systems and developments (such as fencing and salting) to control livestock use. Range improvements will be constructed where they are cost effective.

Timber Management Actions. No timber harvest is planned on Targhee National Forest lands.

On BLM lands, timber harvest will be scheduled on 3,000 acres. The Montana Cooperative Elk Logging Study recommendations (USDA, FS 1982), including any future revisions to the study and the Dillon Sustained Yield Unit Timber Management Plan Environmental Assessment will be followed. Production of wood products will be subject to the principles of multiple use, sustained yield, and environmental quality and protection. For example, restrictions will be applied to protect other resource values, such as recreation areas, streamside corridors, watershed protection, scenic corridors, and wildlife habitat.

Mineral and Energy Management Actions. Most of the Targhee National Forest lands (42,040 acres) will be available for mineral exploration and leasing. Special stipulations will be attached to all mineral leases to protect specific resources. Stipulations prohibiting surface occupancy will apply to some environmentally sensitive sites. The Tin Cup building stone claim (approximately 160 acres in T. 14 N., R. 42 E., Sec. 13, 14, 17, 18) will be administered under existing 36 CFR 228 regulations. Approximately 20 acres is currently developed. Exploration and development will be guided by Forestwide standards and guidelines.

On BLM lands, mineral and energy development will be allowed but surface occupancy will be prohibited on leasable minerals. There are current existing oil and gas leases and applications. Due to the low mineral potential, no development is anticipated. (See Mineral Leasing Map in back of document.)

Unstable Soils Management Actions. On Targhee National Forest lands, watershed stabilization projects (contour furrowing) will be monitored and maintained by hand. Present projects are outside and to the east of the area recommended for wilderness. Rate of soil erosion will be dependent on the amount of mineral activity on the 160-acre Tin Cup claim. There is low to moderate potential for expansion outside of existing claims. No other development activities are planned. East Dry Creek Road (two miles) and Keg Springs Road (two and one-half miles) will be upgraded to prevent degradation of the soil and water resource. Best Management Practices (see Appendix L) will be used in conjunction with all activities.

On BLM lands, an Area of Critical Environmental Concern classification will be considered for existing and potential mass failure sites. Special mitigative measures, primarily avoidance, will be applied to any projects proposed in those areas to prevent mass failure of soils.

Alternative 2

All Wilderness (92,815 Acres-Suitable)

Alternative 2 recommends wilderness designation for the entire Centennial Study Area, including the 16,650-acre Sheep Station. This represents the maximum acreage that could be recommended for wilderness designation (see Alternative 2 Map). This alternative emphasizes the preservation of identified wilderness values over the production of other resources which are or may be present in the study area.

The following summary by resource details the direction management would take if this alternative were selected.

Management of Lands Recommended for Wilderness

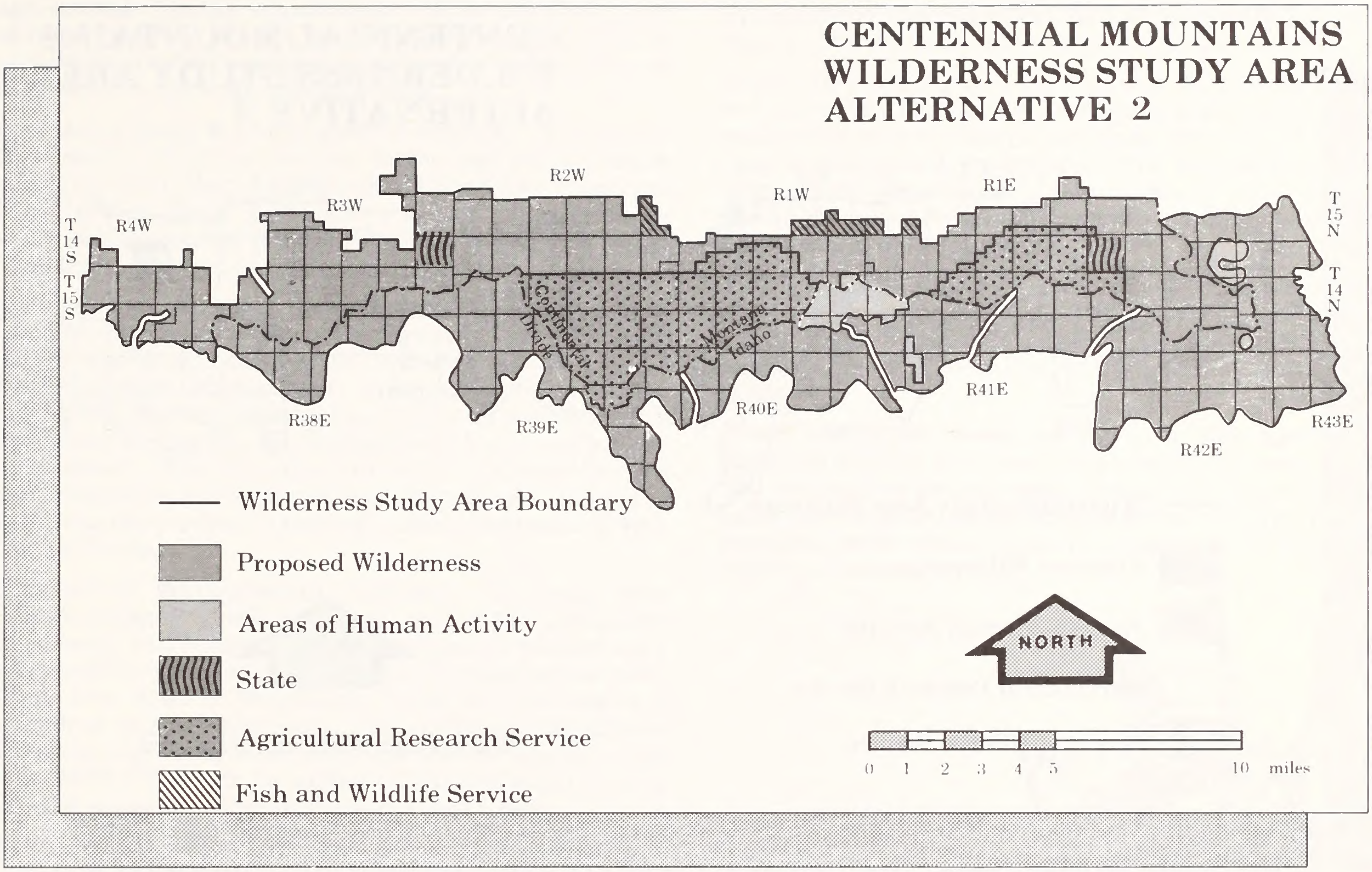
The 27,691 acres of public lands will be managed under the BLM's Wilderness Management Policy, and the 4,474 acres managed by the Beaverhead National Forest and the 42,040 acres managed by the Targhee National Forest will be administered under the Forest Service Wilderness Policy. The 16,650-acre Sheep Station does not fall under the purview of the Wilderness Act or FLPMA but, if designated, would probably be administered under BLM's Wilderness Management Policy. The 1,160 acres proposed for acquisition from the State of Montana via exchange would be administered under BLM's Wilderness Management Policy. The 800 acres administered by Fish and Wildlife Service will be managed under their guidelines.

Recreation Management Actions. Under this alternative, 16.5 miles of vehicle ways would be closed to vehicle use. Two cherry-stemmed roads totaling four and one-half miles would remain open to hunting, fishing, and other recreation access. Access to the Sheep Station work camps at Keg Springs and East Fork Dry Creek will be maintained. The entire study area would be closed to snowmobiles. No recreation facilities would be constructed.

Wildlife Habitat Management Actions. In Idaho, 25,300 acres will be managed as Situation 2 grizzly bear habitat according to the *Grizzly Bear Guidelines* (USDI, FWS 1986). No wildlife or grizzly bear habitat improvement projects will be undertaken on National Forest lands.

Some potential exists for the reintroduction of goats into certain portions of the Centennials since goats are native to Montana. Reintroduction into the Centennials would have to be approved by the Montana Department of Fish, Wildlife, and Parks.

Range Management Actions. Livestock grazing will be managed with an emphasis on protection of the natural integrity of the study area. The existing 2,440 AUMs of use would continue for the foreseeable future. The ongoing encroachment of the forest would likely decrease the forage



CENTENNIAL MOUNTAINS WILDERNESS STUDY AREA ALTERNATIVE 2

for grazing by an unquantifiable amount in the long term. A fire management policy that allows fires to burn within containment areas would tend to offset forest encroachment and open holes in the canopy. The construction of planned structural improvements including fences and spring developments using nonmotorized methods would be allowed, but no projects using hand labor are projected. In the Peet Creek allotment north of the Divide, one-half mile of fence would probably be constructed using nonmotorized means. The maintenance of 18 miles of existing fencelines, and five spring and lake developments would continue; nonmotorized transportation is being used at present to maintain these developments.

Three allotments on the Sheep Station are used for sheep grazing. The west portion, encompassing the Odell Creek drainage, is broken into two allotments—Odell Creek and Big Mountain. Grazeable acreage and average numbers of sheep grazing are respectively: 2,534 acres—679 ewes with lambs and 3,687 acres—864 ewes with lambs. The eastern allotment is the Tom Creek/Meyers Creek Allotment including 5,538 grazeable acres and 933 ewes with lambs. Grazing on these allotments ranges from 52 to 56 days annually beginning in early to mid-June and ending about the first week in September.

Timber Management Actions. No timber harvest would be allowed in the study area. Insects or diseases may be controlled if resources outside the wilderness are threatened.

Mineral and Energy Management Actions. No new mining claims or leases would be allowed, although oil and gas leases on 12,785 acres will be valid until they expire. No development is projected. The decorative rock claim (Tin Cup—160 acres) south of the Continental Divide will continue operations and would be subject to the Forest Service policy as discussed under Alternative 1.

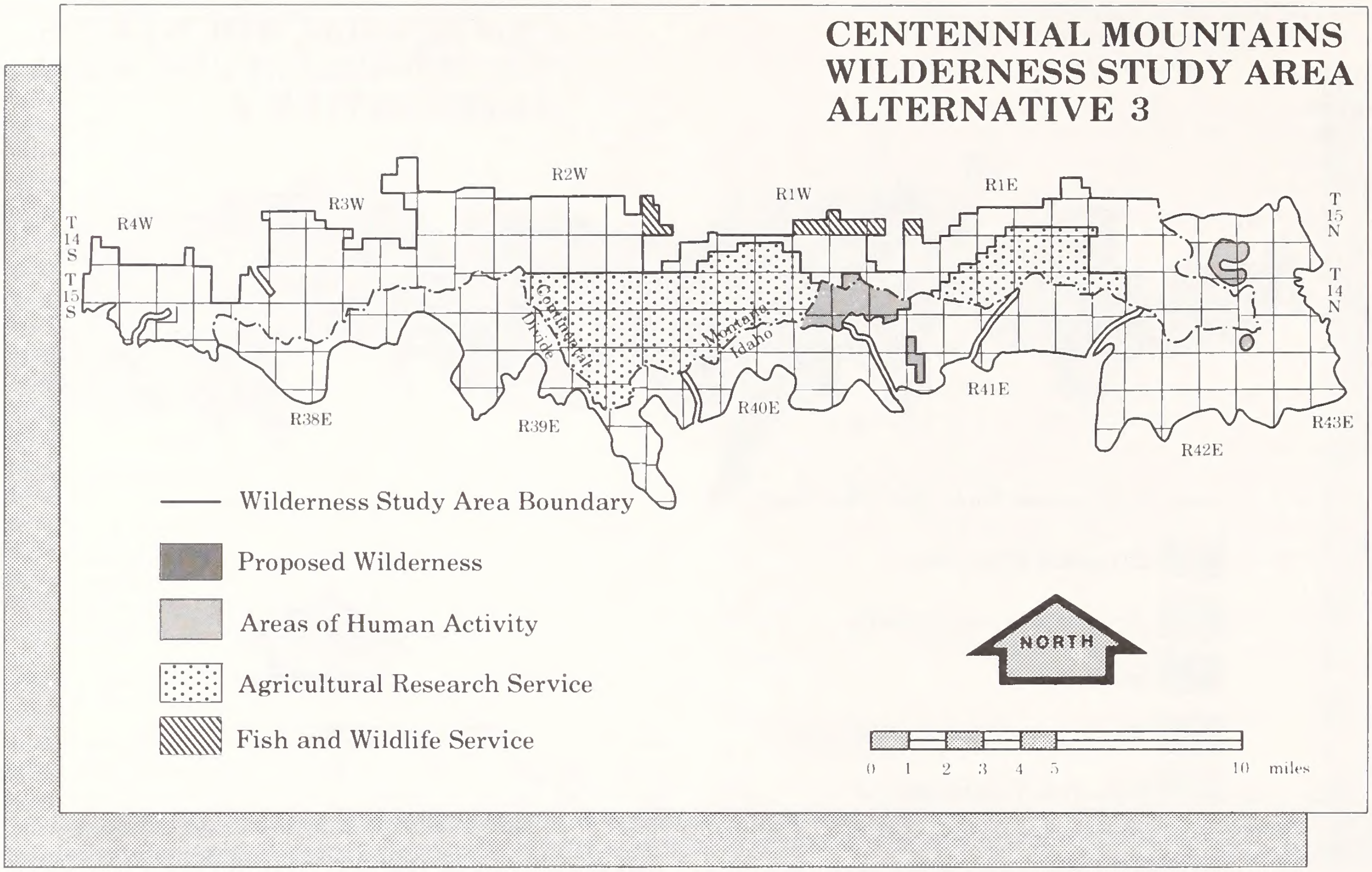
Unstable Soils Management Actions. Current soil stability and water quality with existing levels of sediment would remain unchanged on 35,303 acres of unstable soils. The maintenance of the watershed stabilization projects on the Targhee National Forest lands would be precluded because motorized equipment is used.

Alternative 3: No Action (92,815 Acres-Nonsuitable)

Wilderness Recommendation

Alternative 3 recommends no part of the 92,815 acres in the Centennial Study Area be designated as wilderness (see Alternative 3 Map). This alternative emphasizes other resource values over preservation of the identified wilderness values. If Congress selects this alternative, existing management plans would govern the management of the study area.

Lands within the study area managed by the Beaverhead National Forest and not recommended for wilderness (4,474 acres) will be managed according to the *Forest Plan* (USDA, FS 1986b). The Forest Plan places the study area into Management Area 1. In summary, this direction will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R39E
R40E
R41E
R42E
R43E
Continental Divide
Montana
Idaho
Wilderness Study Area Boundary
Proposed Wilderness
Areas of Human Activity
Agricultural Research Service
Fish and Wildlife Service
NORTH
0 1 2 3 4 5 10 miles

maintain existing opportunities for using the resources found within the study area, managing them in a custodial role with a low level of investment.

Recreation Management Actions. No developed recreation facilities, such as campgrounds, will be constructed. There are no projected changes in use pattern of the area. No maintained public access presently exists for motorized vehicles.

Wildlife Habitat Management Actions. Existing vegetation composition and levels would be maintained by not increasing livestock use. This includes forage and cover in key vegetative communities beneficial to wildlife, especially elk.

Range Management Actions. A very small area adjacent to Red Rock Pass is part of a small allotment that allows a minimal amount of grazing but not identifiable as specific AUMs. Existing range improvements will be maintained. No new improvements are projected at this time.

Timber Management Actions. Timber harvest will not be scheduled.

Mineral and Energy Management Actions. About 1,082 acres of the study area would be available for mineral exploration and leasing.

Unstable Soils Management Actions. There are no known projects projected.

Lands within the study area managed by the Targhee National Forest and not recommended for wilderness (42,040 acres) will be managed according to the *Land Management Plan for the Targhee National Forest* (USDA, FS 1985b). The Land Management Plan places the study area into Management Area 5. In summary, this will result in the area remaining essentially undeveloped as described below.

Recreation Management Actions. No developed recreation sites will be constructed. Cherry-stemmed East Dry Creek and Keg Springs roads (4½ miles) will remain open.

Wildlife Habitat Management Actions. Adequate forage to support existing elk populations will be made available by not increasing livestock grazing. The 25,300 acres delineated as Situation 2 grizzly bear habitat will be managed according to the *Grizzly Bear Guidelines* (USDI, FWS 1986). Wildlife and fisheries habitat improvement projects are not planned in the near future.

Range Management Actions. Livestock grazing will be managed for a small increase (from 1,590 to 1,865—17 percent) in use and an improvement in range condition. Range improvements (spring developments, fencing, etc.) could be constructed where cost effective. None are projected at this time. Livestock grazing in riparian areas will be managed by fencing to prevent damage to streams. There are currently no damaged areas.

Timber Management Actions. No timber harvest is planned.

Mineral and Energy Management Actions. All Targhee lands would be available for mineral exploration and leasing. Special stipulations will be attached to all mineral leases to protect specific resources. Stipulations prohibiting surface occupancy will be attached to leases on some environmentally sensitive sites.

Unstable Soils Management Actions. Watershed stabilization projects (contour furrowing) will be maintained by hand labor. East Dry Creek Road (two miles) and Keg Springs Road (two and one-half miles) will be upgraded to prevent degradation of the soil and water resource.

Lands within the study area managed by the Bureau of Land Management and not recommended for wilderness (27,691 acres) will be managed according to the *Dillon Resource Area Management Framework Plan* (USDI, BLM 1979). The direction for the study area is outlined in a number of sections in the Management Framework Plan. In summary, that direction will result in timber harvest and mineral exploration west of Matsingale Creek and maintain the roadless nature of public lands east of Matsingale Creek.

Recreation Management Actions. The study area from Matsingale Creek to the east end of the Centennial Mountains will be managed as roadless. Motorized vehicles would be excluded in this section. Vehicle access in the study area west of Matsingale Creek will be managed according to the Interagency Travel Plan for Southwest Montana. Currently 3,860 acres are open to vehicle access from May 1 through December 1. Snowmobilers will be allowed to use the corridor through Odell Creek.

Wildlife Habitat Management Actions. Peregrine falcons will be reintroduced in cooperation with the Peregrine Falcon Recovery Team. Actual locations are yet to be determined.

Range Management Actions. On BLM lands, the existing 850 AUMs of livestock grazing will be managed to protect other resources such as water quality and riparian habitat. If these resources show damage from livestock grazing, changes will be made in livestock use. None are projected at this time, but if they occurred, these changes may be in season of use, grazing systems, or number of livestock.

Timber Management Actions. Timber harvest will be excluded on 27,691 acres of BLM lands east of Matsingale Creek. Timber harvest is projected to be scheduled in the future on 13,200 acres of suitable forest land. The harvest method will be determined when the development plan is written. No additional major access roads are projected. The Montana Cooperative Elk Logging Study recommendations (USDA, FS 1982) including any future revisions will be followed.

Mineral and Energy Management Actions. Management direction will prohibit surface occupancy of mineral leases and withdraw the area east of Matsingale Creek from location of mineral claims. Protection of the Centennial Range fault escarpment which is of considerable geologic scientific significance will be accomplished by excluding activities that may be harmful to it. Other sensitive areas will be protected by restricting surface occupancy. Potential for mineral development is low.

Unstable Soils Management Actions. Sites of existing or potential mass failure of soils will be considered for designation as Areas of Critical Environmental Concern. Special mitigative measures such as avoidance will be applied to any projects to prevent mass failure of soils.

These lands managed by the Fish and Wildlife Service are not part of the Red Rock Wilderness due primarily to their separation from the designated lands. They would be managed to maintain diversity of wildlife and other habitats. They are used for a minor amount of hunting and access to the BLM lands behind. However, due to their steep topography this is also limited.

These lands managed by the State of Montana are currently being acquired by the BLM or are proposed for acquisition. When the exchanges are finalized, the acquired lands will be managed the same as adjacent BLM lands.

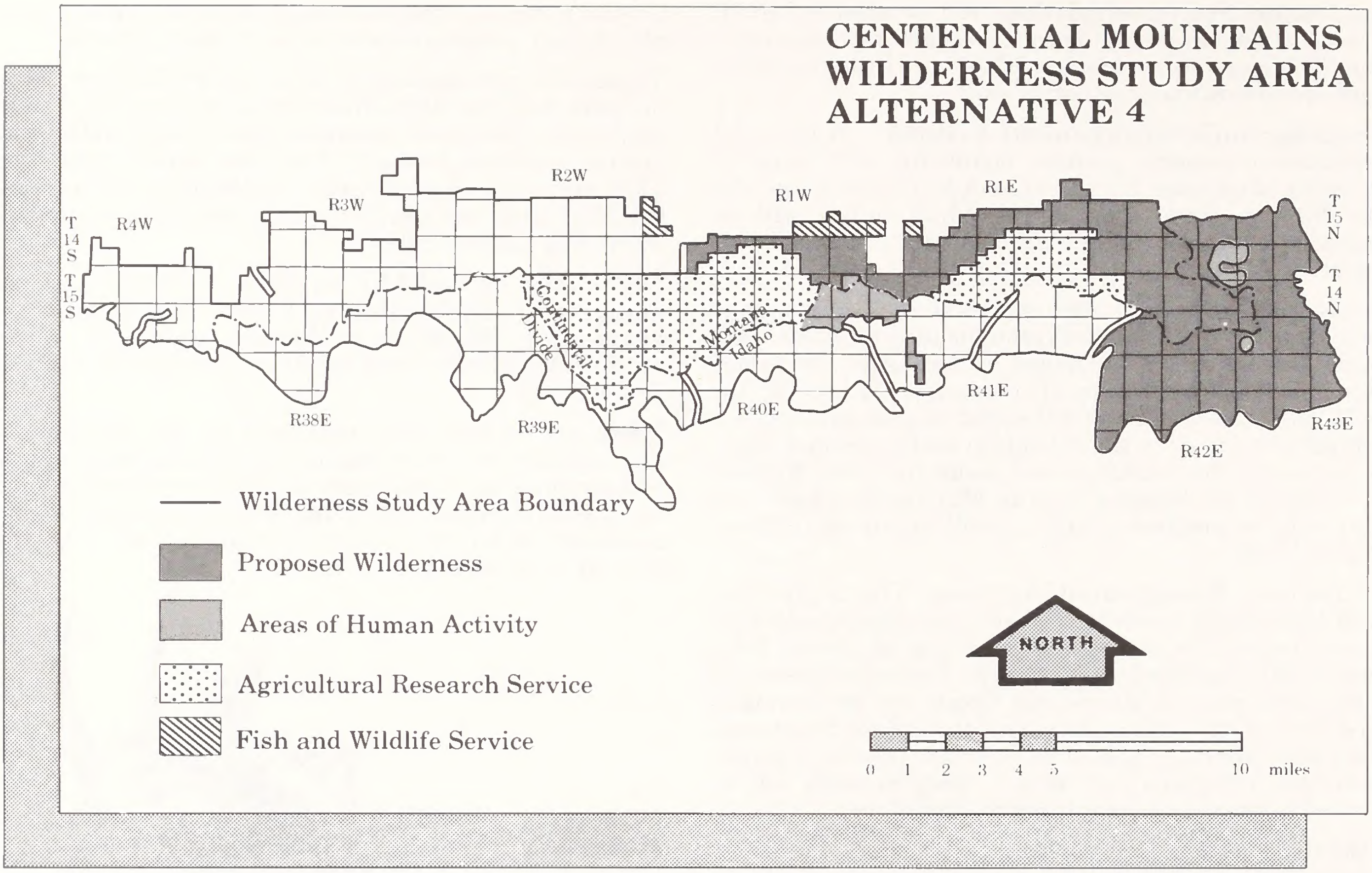
There are 16,650 acres managed by the Agricultural Research Service. It is assumed these 16,650 acres of land will continue to be managed as they are currently managed. That is, primarily grazing of sheep and experimental chemical weed control with no management of wildlife habitat or recreation use.

Alternative 4

Wilderness Recommendation (27,859 Acres-Suitable, 64,956 Acres-Nonsuitable)

Alternative 4 recommends 12,376 acres north of the Continental Divide and 15,483 acres south of the Divide for a total of 27,859 acres suitable for wilderness designation. As shown on the Alternative 4 Map, the lands lie east of Section 31, T. 14 S., R. 1 W. in Montana and east of Tin Cup Road in Idaho and are the eastern most portion of the study area.

Much of the northern boundary is adjacent to the Red Rock Lakes National Wildlife Refuge with the remainder bordering privately owned land. To the south is land withdrawn



for the Sheep Station. Targhee National Forest lands form the border to both the south and east in Idaho.

This alternative recommends most of the highest mountains overlooking the Centennial Valley for wilderness designation. The Sheep Station and phosphate mining area around Taylor Mountain are outside the boundaries of this alternative. However, the two watershed terracing projects are inside the boundary. A total of 64,956 acres are not recommended for wilderness.

The following summary details the direction management would take if this alternative were selected. Management direction for portions of the area recommended for wilderness will be detailed separately from management direction for portions not recommended for wilderness.

Management of Lands Recommended for Wilderness

The 7,302 acres of BLM land and 600 acres of land to be acquired from the State of Montana would be managed under the BLM's Wilderness Management Policy. The 4,474 acres managed by the Beaverhead National Forest and the 15,483 acres managed by Targhee National Forest would be administered under the Forest Service Wilderness Management Policy.

Management of lands recommended for wilderness would be similar to Alternative 1. Aquatic habitat watershed that would remain undisturbed would decrease to 18,974 acres. Range improvements planned for the Idaho allotments and water stabilization projects will not be constructed. The west boundary will be moved to the east into Section 31 to exclude the Odell Creek drainage to provide a snowmobile corridor to be used from December 1 through April 30.

The 27,859 acres recommended for wilderness is occasionally visited by the grizzly bear and will remain undisturbed. A total of 15,483 acres recommended for wilderness in Idaho south of the Divide will be managed as Situation 2 in accordance with the *Grizzly Bear Guidelines*. Under these guidelines, grizzly bear use is an important use, but not the primary, use of the area (USDI, FWS 1986). No wildlife or grizzly bear habitat improvement projects will be undertaken on National Forest lands.

Recreation Management Actions. Odell Creek would remain open as a snowmobile corridor from December 1 through April 30. The corridor passes through one-fourth mile of lands recommended for wilderness to complete the loop trail. The seasonal use of the corridor is approximately 1,600 snowmobiling visitor days. Other off-road vehicle use will continue to be prohibited on designated BLM lands. No recreation facilities are planned. A Memorandum of Understanding with stipulations to protect sheep grazing on the Sheep Station will be developed for use of the Continental Divide trail on the Sheep Station. Approximately six miles of trail will be on or immediately adjacent to the area recommended for wilderness. Hunting will likely continue in the current nonmotorized mode.

Wildlife Habitat Management Actions. Under this alternative there would be no wildlife management actions.

Range Management Actions. There is no grazing occurring in this area.

Timber Management Actions. None of this area is suitable for timber harvest.

Mineral and Energy Management Actions. No new mineral claims or mineral leases will be allowed on the lands designated wilderness. Existing oil and gas leases covering 1,166 acres could be explored until they expire under stipulations designed to protect the wilderness resource. Development of 16 lode claims for decorative building stone would require a mineral examination by the Forest Service to determine if the claims are valid within the meaning of the Mining Law. If the claims were found to be valid, the operator would be allowed to impair wilderness values as provided for in Section 4d of the Wilderness Act. Mining action is predominately picking off the surface. A small tractor may push material around to loosen it up. Access would not be required. A validity exam would be conducted after the area is designated wilderness. If the claims were found to be invalid, the claims would be contested and removed.

Unstable Soils Management Actions. No projects for soil stabilization will occur. Water quality and sediment levels will be influenced only by natural events.

Management of Lands Not Recommended for Wilderness

The 26,557 acres managed by the Targhee and not recommended for wilderness will be administered according to the *Land Management Plan for the Targhee National Forest* (USDA, FS 1985b). The 20,389 acres of BLM land not recommended for wilderness will be managed according to the *Dillon Resource Area Management Framework Plan* (USDI, BLM 1979).

Recreation Management Actions. No developed sites will be constructed. Recreation opportunities will be provided in the semiprimitive, nonmotorized Recreation Opportunity Spectrum category (see Appendix N), which allows essentially no development. Snowmobiling will be allowed in winter. The Keg Springs and East Dry Creek roads from the south will remain open with no restrictions on amount of use. Keg Spring Road averages an estimated six vehicles per day due to the popularity of Blair Lake. East Dry Creek is used by about three vehicles per day. During hunting season the use increases about five times the normal use. Willow Creek and Taylor Creek roads are gated allowing authorized use only.

On BLM lands, vehicle access will be managed according to the Interagency Visitor Map for Southwest Montana. Currently 3,860 acres are open to vehicle access from May 1 through December 1.

Wildlife Habitat Management Actions. The Targhee National Forest lands will be managed for an increase in elk population and a small increase in elk security cover by maintaining the integrity of the area through reduction of road building and timber harvesting (none is projected). Situation 2 grizzly bear habitat (25,300 acres) will be managed according to the *Grizzly Bear Guidelines*. Under these guidelines, grizzly bear use is an important use, but not the primary use of the area (USDI, FWS 1986). No projects are planned in the near future to improve wildlife and fisheries habitat.

On BLM lands, peregrine falcons will be reintroduced in cooperation with the Peregrine Falcon Recovery Team. Sites will be in rugged areas where no development will take place. The specific sites will be determined at a future date.

Range Management Actions. On Targhee National Forest lands, livestock grazing will be managed for a small increase in use (275 AUMs from 1,590 to 1,885) and an improvement in range condition. This can be done through grazing systems and developments (such as fencing and salting) to control livestock use. Construction of one-half mile of fence in the Price-Peet allotment will occur. Range improvements will be constructed where they are cost effective.

Timber Management Actions. No timber harvest is planned on Targhee National Forest lands.

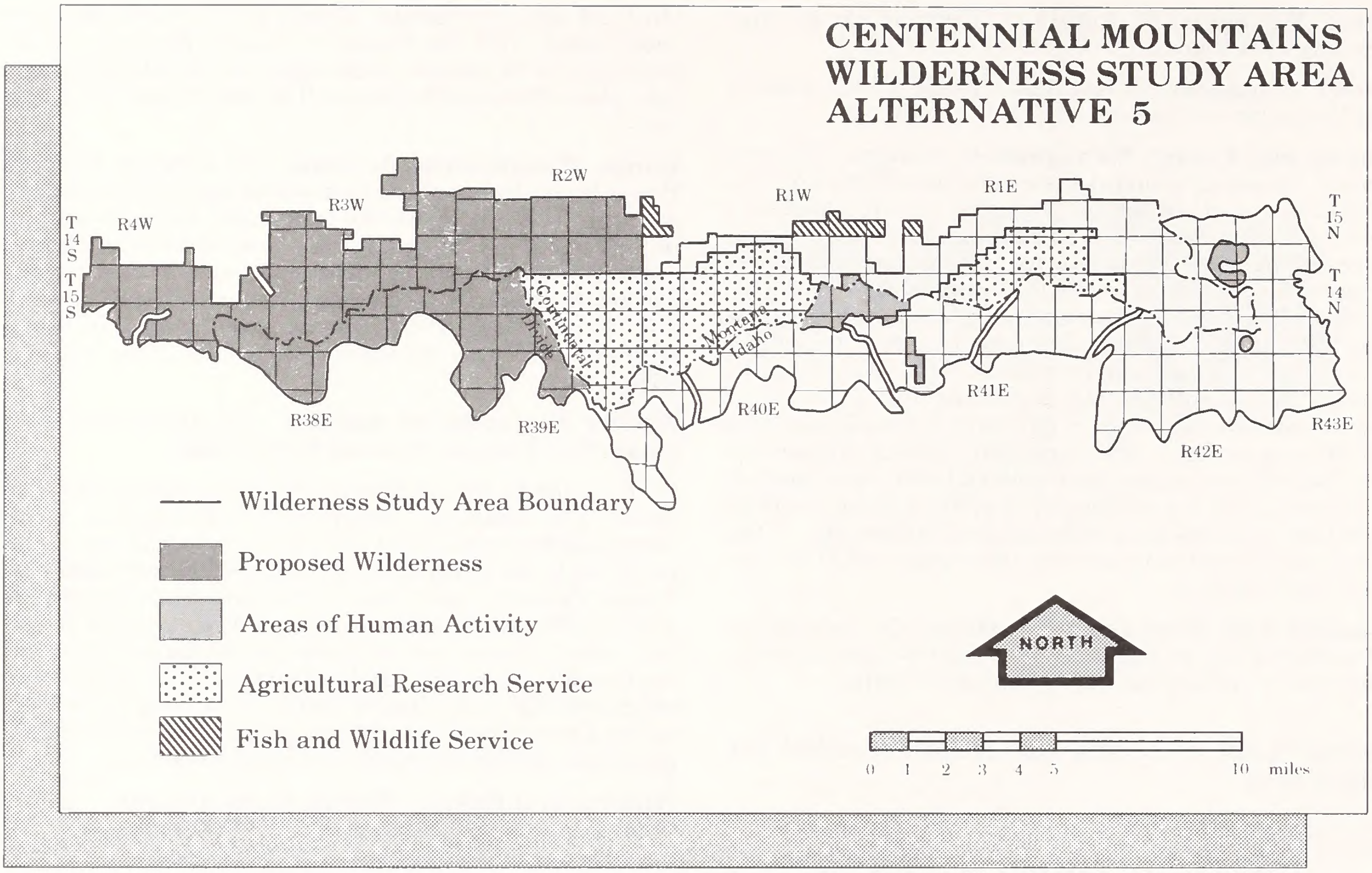
On BLM lands, timber harvest will be scheduled on 13,200 acres. The Montana Cooperative Elk Logging Study recommendations (USDA, FS 1982), including any future revisions to the study and the Dillon Sustained Yield Unit Timber Management Plan Environmental Assessment will be followed. Production of wood products will be subject to the principles of multiple use, sustained yield, and environmental quality and protection. For example, restrictions will be applied to protect other resource values, such as recreation areas, streamside corridors, watershed protection, scenic corridors, and wildlife habitat.

Mineral and Energy Management Actions. A large portion of the Targhee National Forest lands (26,557 acres) will be available for mineral exploration and leasing. Special stipulations will be attached to all mineral leases to protect specific resources. Stipulations prohibiting surface occupancy will apply to some environmentally sensitive sites. The Tin Cup building stone claim (approximately 160 acres in T. 14 N., R. 42 E., Sec. 13, 14, 17, 18) will be administered under existing 36 CFR 228 regulations. Approximately 20 acres is currently developed. Exploration and development will be guided by Forestwide standards and guidelines.

On BLM lands, mineral and energy development will be allowed but surface occupancy will be prohibited on leasable minerals. There are current existing oil and gas leases and applications. Due to the low mineral potential, no development is anticipated. (See Mineral Leasing Map in back of document).

Unstable Soils Management Actions. On Targhee National Forest lands, watershed stabilization projects (contour furrowing) will be monitored and maintained by hand. Present projects are outside and to the east of the area recommended for wilderness. Rate of soil erosion will be dependent on the amount of mineral activity on the 160-acre Tin Cup claim. There is low to moderate potential for expansion outside of existing claims. No other development activities are planned. East Dry Creek (two miles) and Keg Springs roads (two and one-half miles) will be upgraded to prevent degradation of the soil and water resource. Best Management Practices (see Appendix L) will be used in conjunction with all activities.

On BLM lands, an Area of Critical Environmental Concern classification will be considered for existing and potential mass failure sites. Special mitigative measures, primarily avoidance, will be applied to any projects proposed in those areas to prevent mass failure of soils.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Idaho
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Wilderness Study Area Boundary
Proposed Wilderness
Areas of Human Activity
Agricultural Research Service
Fish and Wildlife Service
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Alternative 5

Wilderness Recommendation (29,904 Acres-Suitable, 62,911 Acres-Nonsuitable)

Alternative 5 recommends for wilderness designation 20,349 acres west of Section 36, T. 14 S., R. 2 W. in Montana. Also included are 9,555 acres west of the head of Scalp Creek in Idaho for a total of 29,904 acres. Private land and the Red Rock Lakes National Wildlife Refuge border the lands to the north. The Sheep Station along with Targhee National Forest lands and BLM lands managed for non-wilderness uses form the border to the south and east. (See Alternative 5 Map.) The wilderness recommendation includes the western portion of the study area.

This alternative includes the lower elevation, more heavily forested lands overlooking the west side of the Centennial Valley. The boundary excludes the 16,650-acre Sheep Station and mineral development areas. A total of 62,911 acres are not recommended for wilderness.

The following summary by resource details the direction management would take if this alternative were selected. Management direction for portions of the alternative recommended for wilderness will be detailed separately from management direction for portions not recommended for wilderness.

Management of Lands Recommended for Wilderness

The 20,349 acres of BLM land will be managed under BLM's Wilderness Management Policy. The 9,555 acres managed by the Targhee National Forest will be administered under the Forest Service Wilderness Management Policy.

Recreation Management Actions. Off road vehicle use will be prohibited. The Price Peet and Bean Creek roads would still be open to spring, summer, and fall motorized use. No facility development is anticipated. A snowmobile corridor would be provided in Odell Creek for use from December 1 through April 30.

Wildlife Habitat Management Actions. The 13,200 acres of important elk late fall and migrational habitat on the west side would remain undisturbed by development activities such as timber and oil and gas activities. No wildlife or grizzly bear habitat improvement projects will be undertaken on Targhee National Forest lands. The 29,904 acres recommended for wilderness is occasionally visited by the grizzly bear and will be managed in an undeveloped state.

Range Management Actions. Livestock grazing will continue at present levels (1,750 AUMs on the Targhee and 850 AUMs on BLM lands). Construction of the one-half mile of fence in the Price Peet allotment would depend on the use of nonmotorized equipment. Some range improvements (such as spring developments) necessary to support livestock grazing in the wilderness recommended portion south of the Divide would not occur under wilderness management.

Timber Management Actions. No timber will be harvested on the lands recommended for wilderness.

Mineral and Energy Management Actions. No new mining claims or leases would be allowed on the lands designated as wilderness. Existing leases on 11,068 acres could be explored until expiration under stipulations designed to protect the wilderness resource.

Unstable Soils Management Actions. No projects for soil stabilization will occur.

Management of Lands Not Recommended for Wilderness

The 4,474 acres of Beaverhead National Forest lands in Montana not recommended for wilderness will be managed according to the *Forest Plan* (USDA, FS 1986b). The 32,485 acres of Targhee National Forest lands in Idaho not recommended will be managed according to the *Land Management Plan for Targhee National Forest* (USDA, FS 1985b). The 7,342 acres of BLM lands not recommended will be managed according to the *Dillon Resource Area Management Framework Plan* (USDI, BLM 1979).

Recreation Management Actions. On National Forest lands, no developed recreation facilities will be constructed; however, toilet facilities will likely be installed in areas suffering resource degradation. Snowmobiles will be allowed in winter.

The BLM lands from Matsingale Creek to the east end of the Centennial Mountains will be managed as roadless. Motorized vehicles would be excluded in this section, except snowmobiles in the Odell Creek corridor from December 1 through April 30.

Wildlife Habitat Management Actions. The Targhee National Forest lands will be managed for an increasing elk population and for slightly more than existing elk security cover by maintaining the integrity of the area through reduction of road building and timber harvesting (none is projected). The amount of cover will not change significantly on Beaverhead National Forest lands as no timber sales are planned. A total of 25,300 acres in Idaho delineated as Situation 2 grizzly bear habitat will be managed according to the *Grizzly Bear Guidelines* (USDI, FWS 1986). No wildlife habitat and fisheries habitat improvement projects will be developed.

On BLM lands, peregrine falcons will be reintroduced in cooperation with the Peregrine Falcon Recovery Team.

Range Management Actions. On Targhee National Forest lands, existing range improvements (fences, springs) will be maintained and new projects, such as fencing, will be developed only to protect resource values. Livestock grazing will be managed for a small increase in use (130 AUMs from 1,590 to 1,720) and an improvement in range condition. Range improvements will be constructed where cost effective. Livestock grazing in riparian areas will be managed by fencing or it will be eliminated to prevent streamside damage.

On BLM lands, livestock grazing will be managed to protect other resources such as water quality and riparian habitat. If these resources show damage from livestock grazing, changes will be made in livestock use. These changes may be in season of use, grazing systems, or numbers of livestock.

Timber Management Actions. Timber harvest will not be scheduled on National Forest lands. Salvage harvest may be permitted to prevent the spread of disease and insect infestations.

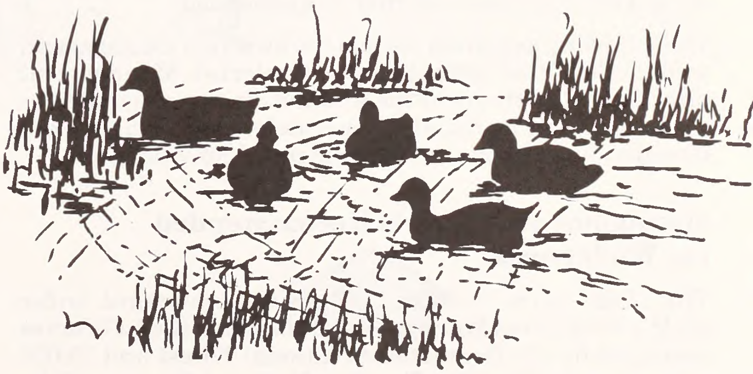
On BLM lands, timber harvest will be excluded east of Matsingale Creek.

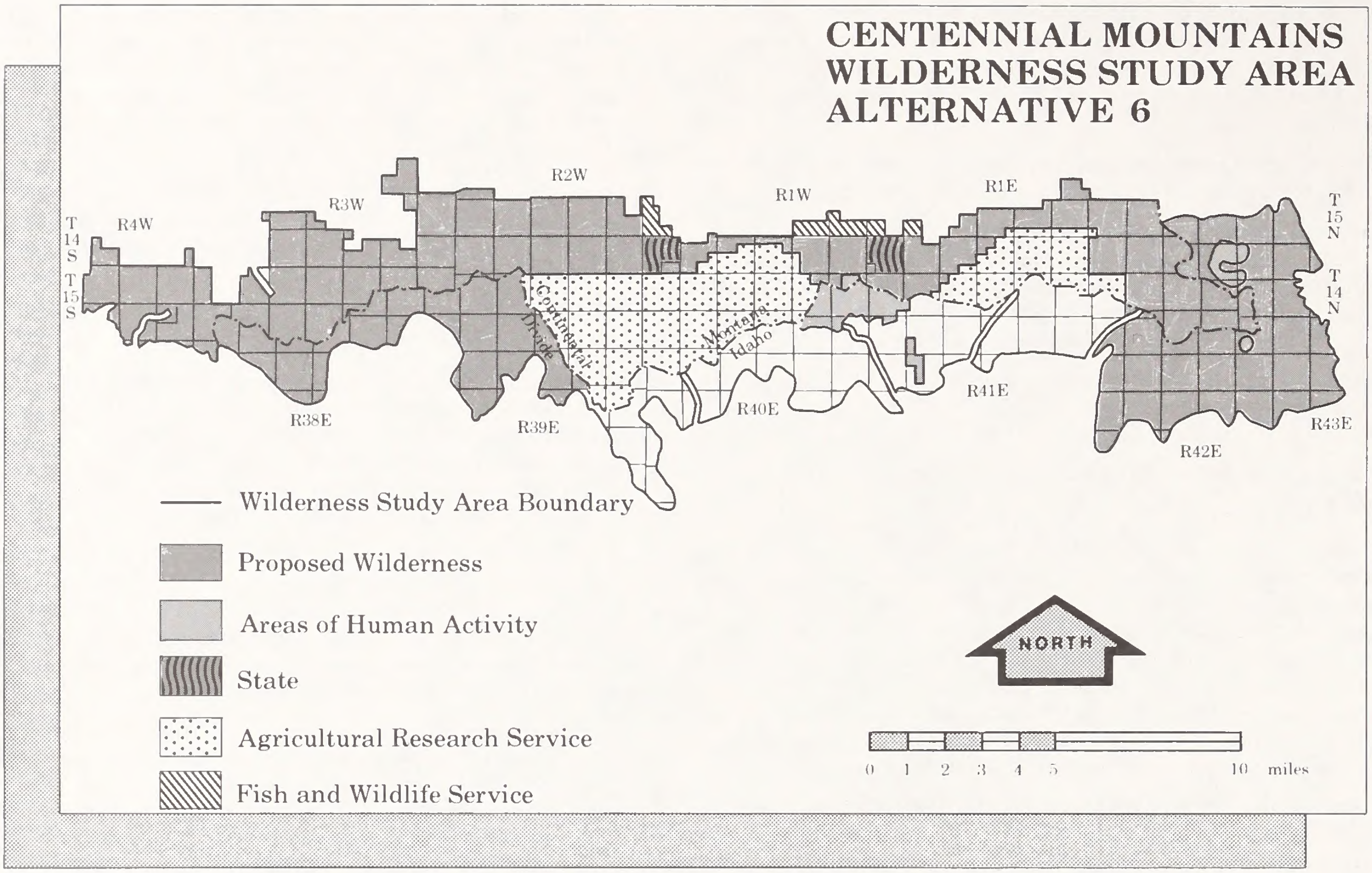
Mineral and Energy Management Actions. Approximately 36,000 acres of the National Forest lands would be available for mineral exploration and leasing. The Tin Cup building stone claim will be administered under existing 36 CFR 228 regulations. Exploration and development will be guided by Forestwide standards and guidelines.

On BLM lands, management direction will prohibit surface occupancy of mineral leases and withdraw the area east of Matsingale Creek from location of mineral claims. Protection is proposed for the Centennial Range fault by disallowing development of the escarpment which is of considerable geologic scientific significance.

Unstable Soils Management Actions. All projects affecting the watershed resource on National Forest lands will incorporate Best Management Practices into project design and implementation (see Appendix L). Watershed stabilization projects (contour furrowing) will be left as is. East Dry Creek Road (two miles) and Keg Springs Road (two and one-half miles) will be upgraded to prevent degradation of the soil and water resource.

On BLM lands, sites of existing or potential mass failure of soils will be considered for designation as Areas of Critical Environmental Concern. Special management and mitigative measures (such as avoidance) will be applied to any projects to prevent mass failure of soils.

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Continental Divide
Montana
Idaho
R38E
R39E
R40E
R41E
R42E
R43E
Wilderness Study Area Boundary
Proposed Wilderness
Areas of Human Activity
State
Agricultural Research Service
Fish and Wildlife Service
NORTH
0 1 2 3 4 5 10 miles

Alternative 6

Wilderness Recommendations (58,363 Acres-Suitable, 34,452 Acres-Nonsuitable)

Alternative 6 recommends 58,363 acres for wilderness designation. See Alternative 6 Map. This alternative includes all the lands recommended for wilderness in both Alternatives 4 and 5. A total of 17,002 acres in Idaho between the head of Scalp Creek and Tin Cup Road, the 16,650-acre Sheep Station, and 800 acres managed by Fish and Wildlife Service are not recommended for wilderness. A total of 34,452 acres are not recommended.

The following summary details the direction management would take if this alternative were selected. Management direction for portions of the alternative recommended for wilderness will be detailed separately from management direction for portions not recommended for wilderness.

Management of Lands Recommended for Wilderness

The 27,691 acres of BLM lands will be managed under BLM's Wilderness Management Policy, and the 4,474 acres managed by the Beaverhead National Forest and 25,038 acres managed by the Targhee National Forest will be managed under the Forest Service Wilderness Management Policy. Lands acquired through exchange with the State of Montana would also be managed under BLM's Wilderness Management Policy. The snowmobile corridor through Odell Creek will be open for snowmobile use from December 1 through April 30. Management of lands recommended for wilderness would be similar to Alternative 2, the All Wilderness Alternative.

The 58,363 acres recommended for wilderness is occasionally visited by the grizzly bear and will remain undeveloped. A total of 15,483 acres recommended for wilderness will be managed as Situation 2 in accordance with the *Grizzly Bear Guidelines* (USDI, FWS 1986).

Management of Lands Not Recommended for Wilderness

The 17,002 acres of Targhee National Forest lands not recommended for wilderness will be managed according to the *Land Management Plan for the Targhee National Forest* (USDA, FS 1985b).

Recreation Management Actions. No developed sites will be constructed. Snowmobiling will be allowed in winter. East Dry Creek and Keg Springs roads will remain open.

Wildlife Habitat Management Actions. The Targhee National Forest lands will be managed for an increase in elk population and a small increase in elk security cover by not allowing timber cutting and limiting the increase in AUMs. A total of 9,817 acres not recommended for wilderness will be managed according to the *Grizzly Bear Guidelines* (USDI, FWS 1986). No projects are planned in the near future to improve wildlife and fisheries habitat.

Range Management Actions. Livestock grazing will be managed for a small increase in use (100 AUMs from 1,590 to 1,690) and an improvement in range condition. Range improvements (fencing, etc.) will be constructed where they are cost effective.

Timber Management Actions. No timber harvest is planned.

Mineral and Energy Management Action. About 17,000 acres of the Targhee National Forest lands will be available for mineral exploration and leasing. The Tin Cup building stone claim will be administered under existing 36 CFR 228 regulations. Exploration and development will be guided by Forestwide standards and guidelines.

Unstable Soils Management Actions. Watershed stabilization projects will be permitted. Rate of soil erosion will be dependent on the amount of mineral activity on the existing mining claims. East Dry Creek and Keg Springs roads will be upgraded to prevent degradation of the soil and water resource.

Alternative 7

Wilderness Recommendation (19,867 Acres-Suitable, 72,948 Acres-Nonsuitable)

Alternative 7 recommends for wilderness designation 19,867 acres in Montana. A total of 13,458 acres of BLM, 16,650 acres of the Sheep Station and 800 acres administered by the Fish and Wildlife Service in Montana plus 42,040 acres of Targhee National Forest will not be designated.

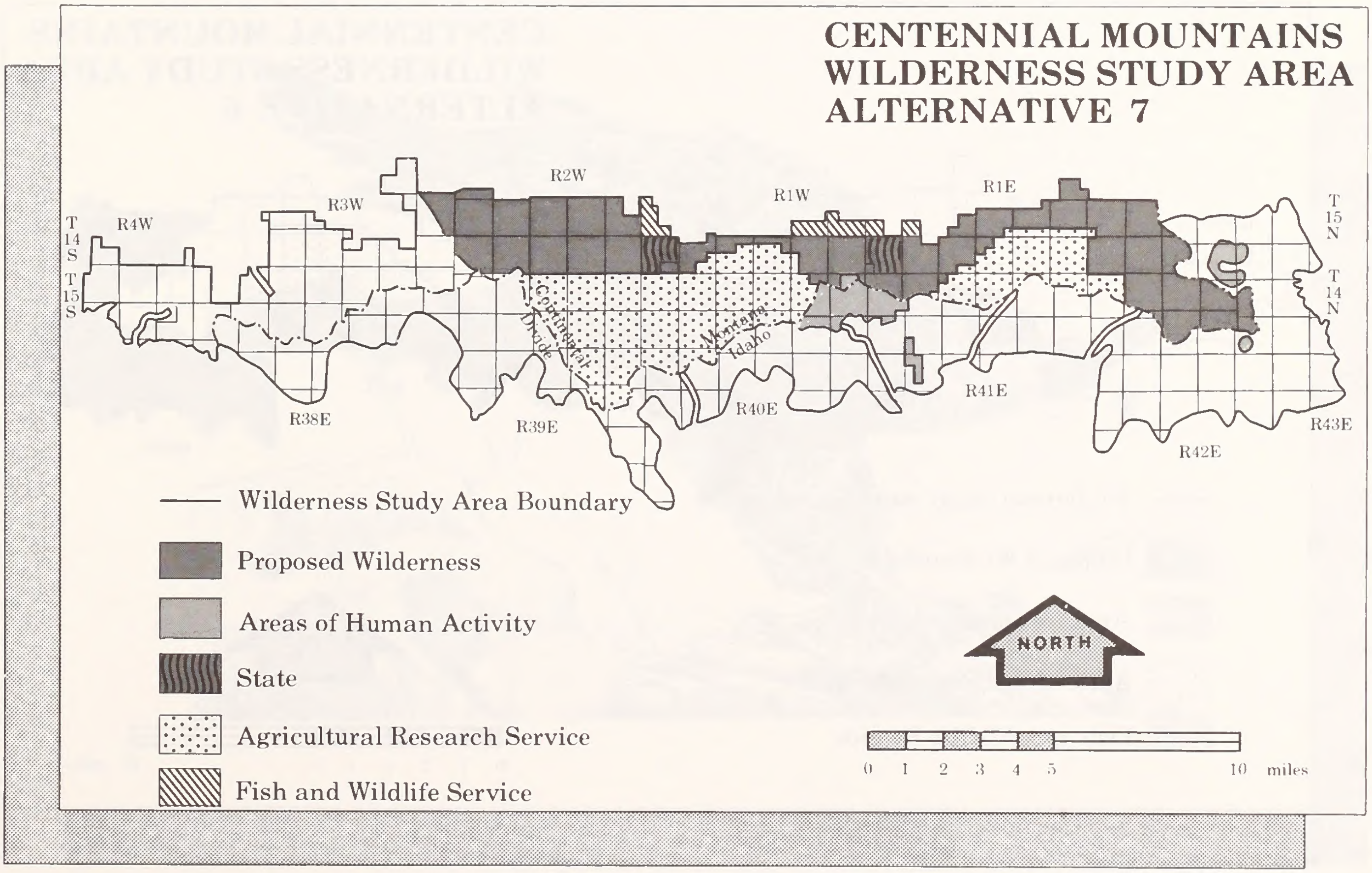
This alternative will assure that the watershed of the Red Rock Lakes National Wildlife Refuge will remain undisturbed. Clean, clear, unpolluted water is essential for grayling trout, the trumpeter swan, and other waterfowl at the refuge. The southern boundary is the Continental Divide and Targhee National Forest lands, to the north is Red Rock Lakes National Wildlife Refuge and privately owned lands; and the eastern border is the boundary between the Beaverhead and Targhee National Forests. See the Alternative 7 Map. Special legislation would be necessary to allow continued use of the Odell Creek drainage as a snowmobile loop trail corridor from December 1 through April 30.

The following summary details the direction management would take if this alternative were selected. Management direction for portions of the alternative recommended for wilderness will be detailed separately from management direction for portions not recommended for wilderness.

Management of Lands Recommended for Wilderness

The 14,233 acres of BLM land, plus any lands acquired through an exchange with the State of Montana, will be managed under BLM's Wilderness Management Policy, and the 4,474 acres of Beaverhead National Forest lands will be managed under the Forest Service Wilderness Management Policy.

Management of lands recommended for wilderness would be similar to Alternative 1. The notable exceptions would be that elk fall and migrational habitat that would remain undisturbed would decrease to 1,500 acres; and aquatic


CENTENNIAL MOUNTAINS
WILDERNESS STUDY AREA
ALTERNATIVE 7
R4W
R3W
R2W
R1W
R1E
T 14 S
T 15 S
T 15 N
T 14 N
Continental Divide
Montana
Idaho
R38E
R39E
R40E
R41E
R42E
R43E
Wilderness Study Area Boundary
Proposed Wilderness
Areas of Human Activity
State
Agricultural Research Service
Fish and Wildlife Service
NORTH
0 1 2 3 4 5 10 miles

habitat watershed undisturbed would decrease to 20,067 acres. The 19,867 acres recommended for wilderness is occasionally visited by grizzly bears and will remain undeveloped.

Management of Lands Not Recommended for Wilderness

The 42,040 acres of Targhee National Forest lands not recommended for wilderness will be managed according to the *Land Management Plan for the Targhee National Forest* (USDA, FS 1985b). The 13,458 acres of BLM land not recommended will be managed according to the *Dillon Resource Area Management Framework Plan* (USDI, BLM 1979).

Management of BLM lands would be similar to management of nonwilderness lands in Alternative 1. The notable exceptions would be the increase in lands available for timber harvest. About 11,700 acres of timber in the northwest portion west of Matsingale Creek could be harvested over the long term. Fences in the Price Peet allotment could be constructed using motorized equipment. A total of 25,300 acres south of the Divide will be managed as Situation 2 according to the *Grizzly Bear Guidelines* (USDI, FWS 1986).

Alternative 8

Wilderness Recommendation (42,040 Acres-Suitable, 50,775 Acres-Nonsuitable)

Alternative 8 recommends for wilderness designation 42,040 acres of Targhee National Forest lands to the south of the Continental Divide in Idaho. A total of 27,691 acres of BLM, 4,474 acres of Beaverhead National Forest, 16,650 acres of the Sheep Station, 1,160 acres of Montana state lands and 800 acres administered by the Fish and Wildlife Service will not be designated as wilderness under this alternative.

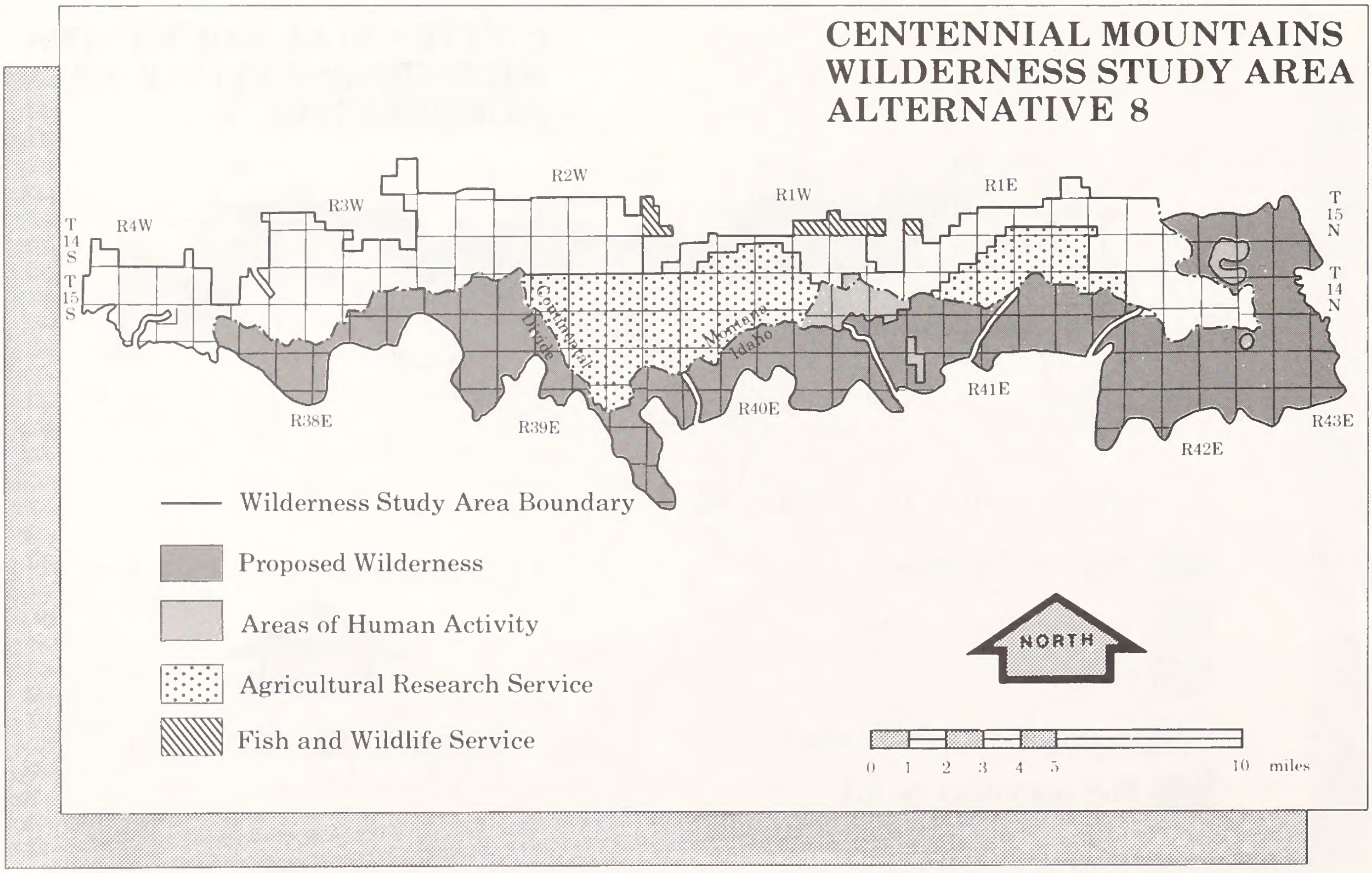
To the north the boundary is the Continental Divide; to the south and east other nonwilderness Targhee National Forest lands form the boundary; and BLM lands form the western boundary. Most of the impacts from development activity in the Centennial Mountain range would be either included in or immediately adjacent to the area recommended for wilderness. The high peaks which form the southern border of the Centennial Valley would not be included. See the Alternative 8 Map. A total of 50,775 acres are not recommended for wilderness.

The following summary by resource details what direction management would take if this alternative were selected. Management direction for portions of the alternative recommended for wilderness will be detailed separately from management direction for portions not recommended for wilderness.

Management of Lands Recommended for Wilderness

The 42,040 acres managed by the Targhee National Forest will be managed under the Forest Service Wilderness Management Policy.

Recreation Management Actions. Two access roads, Keg Springs, and East Dry Creek, south of the Continental Divide will remain open. This will maintain access to the


CENTENNIAL MOUNTAINS
WILDERNESS STUDY AREA
ALTERNATIVE 8
R4W
R3W
R2W
R1W
R1E
T 14 S
T 15 S
T 15 N
T 14 N
Continental Divide
Montana
Idaho
R38E
R39E
R40E
R41E
R42E
R43E
Wilderness Study Area Boundary
Proposed Wilderness
Areas of Human Activity
Agricultural Research Service
Fish and Wildlife Service
NORTH
0 1 2 3 4 5 10 miles

Sheep Station and the decorative building stone claim is accessed by the Willow Creek Road. All are prior existing rights which have been excluded from the study area. Snowmobile use will be prohibited. Odell Creek corridor would be open to snowmobile use in the winter, although closure of the Targhee National Forest lands would decrease interest in the route. No recreation facilities are planned.

Wildlife Habitat Management Actions. Wildlife habitat would remain undisturbed by development activities, such as logging and oil and gas activities. This would include 38,490 acres of elk summer range.

The 42,040 acres recommended for wilderness is occasionally visited by the grizzly bear. It contains 25,300 acres managed as Situation 2 according to the *Grizzly Bear Guidelines* (USDI, FWS 1986). No wildlife and grizzly bear habitat projects will be undertaken.

Range Management Actions. Livestock grazing will continue at current levels (1,590 AUMs). No range improvement projects to increase livestock forage would be constructed south of the Divide except as would be compatible with the wilderness recommendation and necessary to protect wilderness values and maintain grazing use.

Timber Management Actions. No timber would be harvested.

Mineral and Energy Management Actions. No new mining claims or leases would be allowed on the lands designated as wilderness. Existing leases could be explored under stipulations designed to protect the wilderness resource until the leases expire. Development of the Tin Cup mining claims would be governed by the Forest Service policy discussed under Alternative 1.

Unstable Soils Management Actions. No new projects for soil stabilization will occur. Motorized maintenance of the watershed stabilization projects would be precluded.

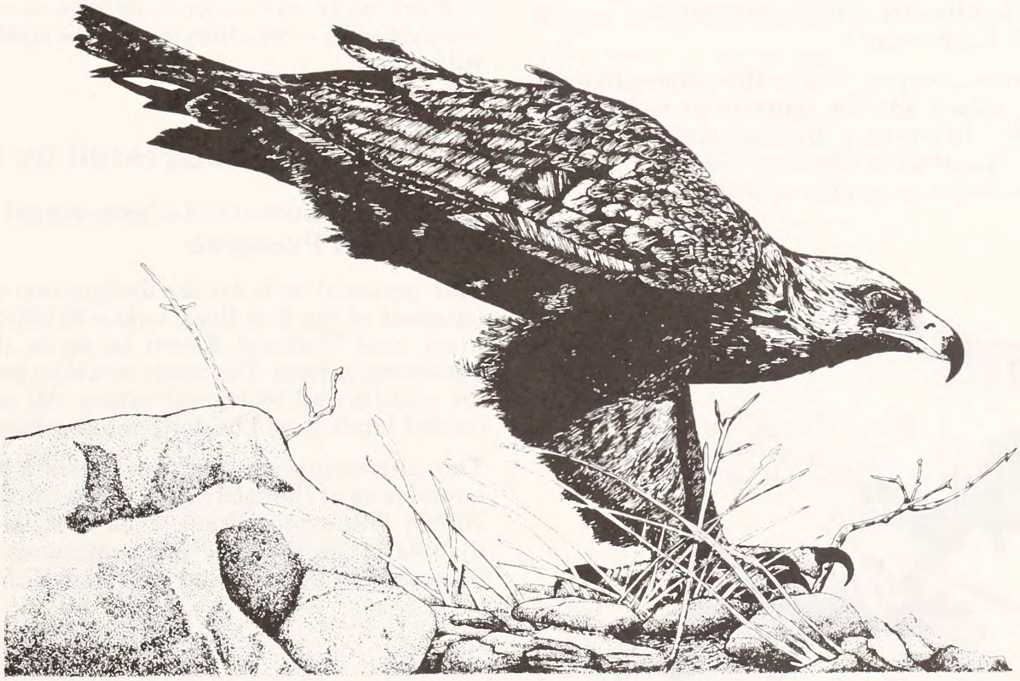
Management Direction for Lands Not Recommended for Wilderness

The 4,474 acres of Beaverhead National Forest lands not recommended for wilderness will be managed according to the *Forest Plan* (USDA, FS 1986b). The 27,691 acres of BLM lands not recommended for wilderness will be managed according to the *Dillon Resource Area Management Framework Plan* (USDI, BLM 1979).

Management of the lands not recommended for wilderness are summarized in Alternative 3 under the following headings:

Management of Lands Managed by the Beaverhead National Forest.

Management of Lands Managed by the Bureau of Land Management.



ALTERNATIVES CONSIDERED BUT NOT RECOMMENDED FOR DETAILED STUDY

Inclusion of the BLM Primitive Area Alone

The lands included in the BLM primitive area are embodied in Alternative 1, the proposed action, which combines the primitive area with the Beaverhead National Forest portion. The inclusion of Beaverhead lands makes no significant change in evaluating the primitive area's suitability for wilderness designation and the impacts on nonwilderness resources remains essentially the same. Therefore the BLM primitive area alternative will not be analyzed separately.

Combination Alternative

An alternative that would combine the proposed action with the lands considered in Alternative 5 was briefly analyzed. This alternative would include all the lands managed by the BLM and the Beaverhead National Forest, and 9,555 acres of land on the west side managed by the Targhee National Forest. The total acreage would be 40,400 acres.

This alternative would have more adverse impact on snowmobile use, forest harvest, and oil and gas than the proposed action. This alternative protects wilderness resources and unstable soils better than the proposed action. The impacts to other resources were similar to the proposed action. The impacts of this alternative are quite similar to those of Alternative 5.

The additional protection provided in this alternative did not offset the increased adverse impacts as well as the proposed action did. In addition, the impacts of this alternative was nearly identical to Alternative 5. Therefore, no further analysis of impacts seemed appropriate.

Inclusion of the BLM Lands Acquired in the First Continental Land Exchange in 1985

Approximately 3,070 acres bounded by the Lakeview to Monida Road and the Price Peet Road were acquired in the BLM's First Continental Land Exchange which totaled 7,532 acres (USDI, BLM 1984b). These lands are intermixed with 1,500 acres of existing BLM lands, and the entire 4,570-acre unit is contiguous to the Centennial Study Area. During the 1982 inventory of the Centennial Mountains, 1,024 acres of the above mentioned BLM lands contiguous to the study area were excluded from the study because of development activities that adversely affected the naturalness of that portion. Some of the newly acquired lands are also adjacent to the 1,024 acres dropped after the 1982 inventory. The majority of these newly acquired lands, however, were not fully reviewed for wilderness characteristics. The federal government previously owned all minerals, and some portions of these lands are currently leased for oil and gas.

On March 16, 1982, the Associate Solicitor issued an opinion that BLM was under no mandatory duty to review acquisitions for wilderness values and in fact was prevented from doing so. A clarifying solicitor's opinion dated August 30, 1985, concluded that the BLM had discretionary authority to study acquired lands for wilderness under Section 202 of the Federal Land Policy and Management Act.

Under this mandate the BLM conducted an intensive field inventory of wilderness characteristics in all 4,570 acres of BLM land east of Price Peet Road and south of the Lakeview to Monida Road. The results of this inventory are displayed in Appendix J of this document.

As these lands lack outstanding opportunities for solitude or a primitive and unconfined type of recreation and are segmented by roads, they will not be further considered for wilderness.

Alternatives Suggested by the Public

Gravelly-Snowcrest-Centennial Biological Preserve

This proposal calls for the designation and unified management of the Red Rock Lakes Wildlife Refuge, Centennials, and National Forest lands in the Gravelly and Snowcrest ranges. The lands would be managed primarily for wildlife and biological values. All presently roadless federal lands would be designated wilderness.

This alternative was not considered in detail because the boundaries of the study area are defined according to the BLM's Wilderness Study Policy. It is inappropriate to include lands that are not contiguous especially when separated by private land or roaded BLM lands.

Conservation Ecosystem Proposal

Several conservation organizations presented an alternative that included 42,040 acres managed by the Targhee National Forest, 4,474 acres managed by the Beaverhead National Forest, 26,996 acres managed by the BLM, 16,650 acres managed by the Agricultural Research Service, and 1,840 acres managed by the Montana Department of State Lands. This alternative was not considered in detail because it is very similar in impacts to the expanded All Wilderness Alternative presented in the final environmental impact statement.

SUMMARY OF IMPACTS

Table 2-2 summarizes the impacts of the proposed action and alternatives for the Centennial Mountains Wilderness EIS.

TABLE 2-2

SUMMARY OF IMPACTS

Significant Issues	Proposed Action Alternative 1	No Action/ No Wilderness Alternative 2	Alternative 3	Alternative 4
Impacts on Wilderness Values	In area recommended for wilderness, all wilderness values preserved "except for approx. 1 acre as the result of a fence project." In the area not recommended, naturalness, solitude, and scenic quality would be lost on 3,000 acres from logging. Grazing improvements such as brush clearing, seeding, and fencing would eliminate naturalness on less than 1% of area. Mining would eliminate naturalness on 160 acres.	All existing wilderness values would be preserved on all but 240 acres of the 92,815-acre WSA. Natural values would be lost on up to 240 acres from expansion of mining operations. Solitude values would be enhanced by the elimination of 975 vehicle use days per year.	ORV use in and around ARS lands will continue to impact solitude and natural values on about 3,000 acres, but no new impacts would occur. Logging activities will eliminate natural values and reduce solitude on up to 13,200 acres. Surface disturbance would reduce elk security cover and grizzly bear habitat with elk displaced and grizzly bears unable to occupy the areas. Siltation from logging disturbance could reduce trout populations by up to 50% on 6 miles of stream.	ORV use in and around ARS lands will continue to impact solitude and natural values and the quality of primitive recreation opportunities on about 3,000 acres. Logging activities will eliminate natural values and reduce solitude on 13,200 acres. Surface disturbance from logging will reduce elk cover and grizzly bear habitat with elk being displaced and grizzly bears unable to occupy the area. Siltation from logging disturbance could reduce trout populations by up to 50% on about 6 miles of stream.
Impacts on Snowmobile Use Levels	In area recommended for wilderness, snowmobile use in play areas would decrease from 1,100 visitor days annually to 0. There is abundant substitute play areas adjacent. No impact is projected in area not recommended for wilderness.	The entire WSA would be closed to snowmobile use including the Odell Creek access trail displacing 1,600 recreation visitor days annually. About 6,350 acres presently used for play areas would be closed.	No impact. Snowmobiling use levels will continue at 1,600 visitor days annually.	There would be no impact in area recommended except for the 1/4 mile in Odell Creek. In the area not recommended, use will remain at about 1,600 visitor days annually.
Impacts on Hunting Use Levels	Hunting use levels will be unchanged. Most existing vehicle access will remain open and those vehicle based hunters will be replaced by horseback or hunting on foot.	Hunting use levels would only drop slightly from 2,680 to 2,580 as vehicle based hunters would be replaced by hunting on horseback or by foot.	Hunting use levels would drop from 2,680 to 2,480 visitor days annually as logging related impacts would displace some animals and temporarily make some areas inappropriate for hunting.	Hunting use levels would drop slightly from 2,680 to 2,480 as a result of logging activities.
Impacts on Motorized Vehicle Access	In the area recommended for wilderness, 100 visitor days annually would be eliminated with closure of 1 mile of vehicle ways. No impact will occur in remainder of WSA.	100 visitor days annually of vehicle based use primarily associated with hunting would be eliminated.	No impact.	There would be no impact as roads created for logging would be closed post logging activities.

Alternative 5	Alternative 6	Alternative 7	Alternative 8
In the area recommended, naturalness and solitude will be affected only by the 1/2 mile of fence in the Price-Peet allotment and will be enhanced by precluding logging on 13,200 acres. In the area not recommended, naturalness, solitude and scenic values would be diminished by ORV use on the Sheep Station. Small amounts of mineral extraction on the Tin Cup claim will diminish naturalness somewhat.	Naturalness would be affected only by the 1/2 mile of fence on the Price-Peet allotment. Naturalness and solitude would benefit by precluding logging on 10,200 acres. Snowmobile use is not expected to increase so there would be no impact. ORV use in and around the Sheep Station would affect solitude and natural values on about 3,000 acres.	ORV use in and around the Sheep Station would affect solitude, natural values and the quality of primitive recreation on 3,000 acres. Logging activities will eliminate natural values and solitude on 13,200 acres. Surface disturbance from logging will reduce grizzly bear habitat and elk cover. Both are likely to be displaced from the areas. Siltation from logging disturbance could reduce trout populations by up to 50% on 6 miles of stream.	No impacts on the area recommended. Naturalness, solitude and primitive opportunities would be adversely affected on 13,200 acres.
No impact. Snowmobile use levels would remain at 1,600 visitor days annually.	No impact.	No impact. Snowmobile use levels will continue at 1,600 visitor days annually.	Snowmobile use would decline by 1,120 visitor days in Idaho. This use is expected to shift to the Sheep Station.
No impact. Hunting use levels are expected to remain at 2,680 visitor days.	No impact.	Hunting will decline by 200 visitor days from 2,180 to 1,980 as a result of logging activity on the area not recommended.	200 visitor days of hunting would be lost in Montana.
An expected 100 visitor use days are expected to be lost on the area recommended. No impact on the area not recommended.	100 visitor use days would be lost due to permanent closure of a 2-mile seasonally closed road.	There would be no impact as roads created for logging on the west end would be closed post logging activities.	No impact.

TABLE 2-2 (continued)

SUMMARY OF IMPACTS

Significant Issues	Proposed Action Alternative 1	No Action/ No Wilderness Alternative 2	Alternative 3	Alternative 4
Impacts on Fall Security Habitat for Elk	Logging on 3,000 acres would displace elk on approximately 15% of their fall security habitat. In the area recommended for wilderness precluding timber harvest on 10,200 acres would preserve existing elk fall security habitat in its present condition.	Wilderness designation will preserve the existing 13,200 acres of elk fall security cover which could otherwise be logged.	Logging of 13,200 acres of elk fall and migrational habitat could cause displacement of the elk herd and could reduce or eliminate the hunting opportunities for up to 25 years or more that the area would be logged.	Logging would degrade 13,200 acres of habitat for elk.
Impacts on Threatened and Endangered Species Habitat (Grizzly Bear)	In the part of the WSA recommended for wilderness (28,688 acres), the area will continue to offer undisturbed habitat for grizzly bears that pass through the area. In the area not recommended for wilderness, logging would make about 3,000 acres unsuitable for grizzly bear to occupy the area.	Grizzly bear would benefit from the alternative by closure of the area to motor vehicles and precluding logging.	Grizzly bear habitat would be eliminated on 13,200 acres that could be logged. Impacts from motor vehicles would continue to impact the bears.	Grizzly bear habitat would be adversely affected on 13,200 acres as a result of logging.
Impact on Offsite and Onsite Aquatic Habitat	Aquatic habitats would benefit from preclusion of timber harvest in the part of the WSA recommended for wilderness. In the part not recommended for wilderness, timber harvest on 3,000 acres could eliminate 50% of cutthroat trout populations in 6 miles of stream as the result of increased sedimentation.	There would be beneficial impact to aquatic habitats as 13,200 acres would be precluded from timber harvest and no downstream sedimentation would occur. Existing trout populations would be unaffected.	Logging impacts on 13,200 acres would cause up to 50% mortality on 26 miles of streams receiving increased sedimentation.	Accelerated erosion and siltation on 13,200 acres of logged area would result in the loss of up to 50% of the fish populations on 6 miles of stream.
Impacts on Grazing Use Levels	There would be no impact on grazing use levels. All proposed increases in AUMs would occur on Forest Service lands not recommended for wilderness.	Designation of the entire WSA would preclude several range projects on the Targhee causing the projected 275 AUM increase to be foregone.	No impact.	Grazing use may increase by 275 AUMs in the area not designated.

Alternative 5	Alternative 6	Alternative 7	Alternative 8
Elk fall and migrational habitat will be protected on 13,200 acres by precluding logging.	Elk fall and migrational habitat will be protected on 13,200 acres.	Elk fall and migrational habitat would be decreased on 11,700 acres. Displacement of the elk herd could reduce or eliminate hunting opportunities for up to 25 years or more that the area would be logged.	13,200 acres would be logged west of Matsingale Creek displacing the elk.
Grizzly bear habitat would remain undisturbed on 29,904 acres but will be displaced from the Sheep Station by the presence of man. Mining on the 160-acre Tin Cup claim would disturb bears crossing the area.	Grizzly bear habitat would be protected on the 58,363 acres recommended for wilderness. On the area not recommended, bears would be affected by traffic on the two access roads and the Sheep Station.	Grizzly bear habitat would be affected on 11,700 acres effectively displacing the bear.	Grizzly bear occupation of 13,200 acres would be precluded by logging.
No impact.	No impact.	Up to 50% reductions in fish populations on about 6 miles of stream could result from siltation caused by logging on 11,700 acres.	Logging impacts on 13,200 acres would adversely affect up to 50% of the fish population on about 6 miles of stream.
Some permittees may experience some inconvenience. Grazing use will be allowed at its present level. In the area not recommended (Targhee), AUMs are expected to increase by 275.	Grazing levels could increase by 275 AUMs on the area recommended.	Livestock grazing may increase by 275 AUMs on the area not recommended.	There would be no change and no impact.

TABLE 2-2 (continued)

SUMMARY OF IMPACTS

Significant Issues	Proposed Action Alternative 1	No Action/ No Wilderness Alternative 2	Alternative 3	Alternative 4
Impacts on Timber Harvest	99.3 mmbf of timber would be foregone on 10,200 acres projected for harvest.	All timber harvest would be precluded. 2.64 mmbf annual yield would be foregone.	No impact.	There would be no impact. 2.64 mmbf of timber would be available annually on 13,200 acres north of the Divide.
Impacts on Oil and Gas Exploration and Development	There would be no significant impact on exploration of oil and gas.	No significant immpact is projected. Much of the area has low probability for occurrence and moderate occurrence areas are inaccessible.	No impact.	There would be no impact as no development is expected.
Potential Income Generated From All Economic Activities by Alternative	$473,658	$135,572	$918,788	$917,448

Alternative 5	Alternative 6	Alternative 7	Alternative 8
A total of 128.5 mmbf of timber on 13,200 acres will be foregone.	A total of 128.5 mmbf of timber will be foregone on 13,200 acres.	About 1,500 acres of suitable timber would be foregone. A total of 2.34 mmbf annually would be available for harvest on 11,700 acres.	There would be no impact as 128.5 mmbf of timber on 13,200 acres would be available.
Because of existing management restrictions, there would be no impact.	No impact since management prescriptions preclude surface occupancy.	No impact. No development is expected.	No impact.
$348,056	$239,398	$790,335	$732,718

CHAPTER 3
AFFECTED ENVIRONMENT

CLIMATE

The climate within the Centennial Study Area is typical of northern, continental mountain ranges, cold and harsh. At the Fish and Wildlife Service headquarters at Lakeview, Montana, the frost free period is 51 days but it is likely to be no more than 10 days in the mountains. Recorded temperatures at Lakeview range from 91 degrees Fahrenheit in August to minus 49 degrees Fahrenheit in January. Average precipitation varies from 50 inches at higher elevations to 15 inches at the lower western end of the study area. Seventy-five percent of the precipitation comes in the form of snow. The study area is usually snow-covered into late June or early July, and it is not unusual to have an early fall snowstorm in September.

Winds are generally light and predominantly from the southwest. During the colder months, temperature inversions commonly occur as dense cold air flows to the Centennial Valley floor during evenings, periods of low wind movement, and during clear, cold nights.

AIR QUALITY

Air quality is excellent in the Centennial Study Area due to the lack of development activity and nearby industry. Wind currents and air movements created by the Centennial Mountains uplift help to maintain a fresh, natural air condition. The airshed over the study area is presently classified as Class II. Temperature inversions commonly occur in the valley but do not result in air pollution problems due to lack of pollution sources.

TOPOGRAPHY

The Centennial Mountains form part of the Continental Divide separating the Centennial Valley in Montana from the broad expanse of the Snake River plain to the south in Idaho. Elevations range from 6,400 feet to over 9,900 feet at the summits of Mt. Jefferson and Baldy, Slide, Taylor, and Sawtell Mountains. The northern face of the range rises nearly 3,000 feet in less than a mile from the Red Rock Lakes National Wildlife Refuge to the tops of the peaks which make up the backbone of the range.

Major drainages such as Odell Creek and Willow Creek follow major faults in the mountain uplift. Other perennial and intermittent creeks drain north and south off the Continental Divide.

RECREATION

Big game hunting and snowmobiling are the major recreation activities in the Centennial Study Area. Big game hunting is expected to increase slightly (MDFWP 1985). Hiking, camping, and fishing are also popular uses of the area. Table 3-1 lists the visitor days associated with each of these activities. The majority of this use occurs in the late summer, fall and winter seasons. The area receives over 2,680 big game hunter visitor days per year. Although most of the Montana side is closed to off road vehicle use, 3,860 acres are presently open to all forms of motorized vehicles in the summer and fall (USDA, FS 1984).

A part of the corridor for the Continental Divide National Scenic Trail goes through the Centennial Study Area. The final location of the trail has been determined and existing trails along the Divide have been marked and signed. An Interim Management Option Plan was completed by the BLM in 1980 covering the corridor from Monida to Red Rock Pass. This plan provided interim management direction until Congress approved the final management plan developed by the Forest Service and the Continental Divide Trail Advisory Council. Interest in the trail has increased

TABLE 3-1

ESTIMATED RECREATION USE IN VISITOR DAYS IN THE CENTENNIAL STUDY AREA

Recreation Use	Island Park Ranger District	Dubois Ranger District	Madison Ranger District	Dillon Resource Area	Total
Hunting	600	800	80	1,200	2,680
Snowmobiling	315	100	81	1,000	1,596

since 1983. Its use is expected to increase as the management plan is completed. Continental Divide trail users account for over 140 visitor days per year.

There are about 38 miles of hiking trails on the Idaho side. These trails are used primarily by hunters, who either hike or ride horses into the study area. A trail management plan has been completed by the Targhee National Forest for maintenance of the trails. Hiking and horseback use of the trails contribute about 950 visitor days per year.

Fishing and fishing-related activities such as backpacking and camping occur along the streams and lakes in the study area. Aldous Lake, Hell Roaring Creek, Odell Creek and Tom Creek support moderate to high value fisheries. Fishing use contributes over 425 visitor days per year.

A popular snowmobile route in winter brings snowmobilers from Island Park or West Yellowstone to Lakeview through the Taylor Creek road and down the O'dell Creek phosphate haul road. Snowmobilers generally then return via Henry's Lake. Areas adjacent to and along the Continental Divide at the heads of Willow Creek and Keg Springs road provide spectacular vistas and play areas for snowmobiles. Snowmobile use contributes 596 visitor days per year.

Approximately one and one-half miles of the snowmobile corridor in Odell Creek crosses private land at the lower end. An easement or some form of agreement will be necessary to legalize this use.

Other recreational uses of the study area center around sight-seeing, photography, cross-country skiing, climbing, and nature study. However the limited access and short summer season inhibit some of these activities.

Access

North of the Continental Divide, legal vehicle access is provided via the Price-Peet road, Jones Creek road, and the Bear Creek road on the west end and the Corral Creek road to the east. Foot access is available through BLM and Fish and Wildlife Service lands in the center portions. South of the Continental Divide, the East Dry Creek Road, and the Keg Springs road supply legal vehicle access to the Continental Divide. The entire north side of the Continental Divide is closed to vehicles in winter except for the Odell Creek trail. The Idaho side is open to winter snowmobiling. Foot access south of the Continental Divide is provided through Targhee National Forest lands outside the study area. On private lands north of the Divide, especially the Alaska Basin area, access is generally denied to the public.

Projected Visitor Trends

It is not anticipated that wilderness designation would substantially increase use of the study area over the long term. There might be an initial increase upon designation, but it is anticipated that such increases would soon return to predesignation levels. This assumption is supported by use levels experienced at the Red Rock Lakes National Wildlife Refuge Wilderness. The area, designated wilderness in 1976, lies immediately north and adjacent to the study area. No significant increase in use occurred after wilderness designation, nor has there been any significant increase in the amount of use occurring in the interim. In 1981, there were an estimated 4,955 visitor days; in 1982, 5,256 visitor days; and in 1983, 6,210 visitor days.

Wilderness designation would not substantially reduce existing opportunities associated with off road vehicle (ORV) use during the summer season. Due to wildlife and watershed concerns, a need would still exist to maintain ORV controls. In addition, steep terrain in much of the study area precludes ORV use. The one exception would involve snowmobile use which could increase in some areas.

It is expected that the amount of hiking, backpacking, and horse riding and packing may increase slightly, especially if trailheads are established.

GEOLOGY

The Centennial Mountains are one of the few mountain ranges in the northern Rockies that trend east-west. The mountains rise abruptly from the Centennial Valley along the Centennial fault zone. The Centennial Mountains are divided into two approximately equal parts by the northeast trending Odell Creek fault. The eastern Centennial Mountains consist of a core of Precambrian rocks overlain by Paleozoic and Mesozoic sedimentary rocks. The eastern Centennials are upthrown relative to the western Centennials along the Odell Creek fault. The western Centennials are composed of upper Mesozoic and lower Tertiary sediments considerably different from those in the eastern Centennials. The rocks in the western Centennials may be part of a thrust plate that was thrust from the southwest along the Monida thrust to its present location. (Witkind 1981). Both the eastern and western Centennials have considerable exposures of Tertiary volcanics ranging from basalt to rhyolite. At one time these volcanic rocks probably covered the entire Centennial Mountains. Erosion has removed much of this volcanic overlay.

Quaternary deposits include Yellowstone and Island Park volcanics, numerous glacial deposits in the eastern Centennials and earthflows, landslides, and other mass wasting features in the western Centennials. The glacial deposits in the western Centennials have been largely obscured by the more recent mass wasting activity.

ENERGY AND MINERAL RESOURCES

The Energy and Minerals Map shows the location of geologic formations containing phosphate, gold, building stone, coal, and oil and gas.

Leasable Minerals

Phosphate

One of the Mesozoic sediments in the eastern Centennials is the phosphate-bearing Permian Phosphoria formation. The phosphate deposits near the crest and along the flanks of Sheep and Taylor Mountains were mined by the J. R. Simplot Company from 1956 to 1958. About 296,000 tons of phosphate were mined by surface mining methods. The remaining identified phosphate resources include 93,100,000 tons of acid-grade rock (greater than 31 percent phosphorus pentoxide), 149,987,000 tons of furnace-grade rock (greater than 24 percent phosphorus pentoxide), and 195,124,000 tons of benefication-grade rock (greater than 18 percent phosphorus pentoxide). Virtually all these resources are available using underground mining methods. Hypothetical resources are approximately twice as large as the identified resources. Phosphate deposits with 150 feet or less of overburden are found on 297 acres on the Montana side of the study area and 1,376 acres on the Idaho side. Possible by-products derived from processing phosphate include vanadium, chromium, uranium, silver, flourine, and the rare earths lanthanum and yttrium (Witkind 1981).

J. R. Simplot submitted an Area of Critical Mineral Potential nomination for Lease M-012510. This lease and other phosphate leases have been excluded from the study area.

The J.R. Simplot Company is considering an exchange lease arrangement exchanging their leases in the Centennial Mountains for lands near their Soda Springs leases. The Centennial leases are no longer considered commercially viable. About 30 years ago, Simplot mined the easily extractable surface ore leaving the underground ore which was more costly to mine. In the ensuing years, the underground ore in the Centennials has become even less feasible to mine economically. However, the Soda Spring leases, which are both surface and underground deposits, are still profitable. With the downturn in the farm economy and the reduced demand for phosphate, many phosphate producers are trying to consolidate their lease holdings in their most profitable areas.

Oil Shale

Petroliferous black shales in the Phosphoria formation contain small amounts of kerogen. A black shale near Reas Peak yielded 6 gallons of oil per ton (Condit 1919).

Oil and Gas

Oil and gas potential is rated from low to moderate in the study area. The western end of the Centennials is the area of most interest with two anticlinal structures. The Peet Creek anticline was drilled unsuccessfully in 1978 by American Quasar. The Odell Creek anticline has not been drilled.

Coal

A thin horizon of subbituminous coal is exposed in the western Centennials. It was mined early in the century to supply coal for a local school. It is not currently of any economic significance.

Locatable Minerals

The potential for precious and base metals is low in most of the study area but moderate in the Beaverhead portion. Geochemical stream sampling and analysis failed to detect any anomalous concentrations of base or precious metals. A small diatreme near the crest of the eastern Centennials might be a likely exploration target but samples show lead values only slightly above background levels (Witkind 1981). Exxon Minerals Company submitted an Area of Critical Mineral Potential nomination for the study area; however, no background information was suppled with the nomination.

Mining claims for decorative building stone are located near Reas Peak. They produce between 50 to 100 tons per year. The access road to the claim and the existing workings has been deleted from the study area.

Saleable Minerals

Rocks suitable for use as decorative stone (quartzite and dolomite) occur near the study area on Reas Peak. There may be additional areas with rock suitable for decorative purposes. There are a wide variety of mineral materials (sand, gravel, etc.) which may be suitable for some local uses.

Mining Claims, Leases, and Permits

Gold prospecting occurred in portions of the Centennials in the past. A site just west of Mt. Jefferson was worked for a time. A mine shaft and associated buildings are still visible. There are no current recorded claims for the site and an analysis by Witkind (Witkind 1981) indicates little evidence for the occurrence of gold.

In Idaho there are 18 lode claims for decorative building stone in Sections 7, 8, 17 and 18, T. 14 N., R. 42 E. There is one Tin Cup Building Stone claim in Montana. The Tin Cup claims operate under an approved operating plan.

These claims cover approximately 160 acres, but only the area presently being mined is excluded from the study area.

There are numerous oil and gas leases, applications, or simultaneous oil and gas lottery (simo) tracts in the study area. On the Montana side, there are 3,145 acres in simo tracts, 10,054 acres of leases and 1,221 acres of lease applications. Oil and gas leases have been denied for most of the core of the primitive area. On the Idaho side, there are 4,900 acres in simo tracts and 2,731 acres leased. There are no pending applications.

Most of the eastern Centennials are covered by the Executive Order of October 9, 1917 which created a withdrawal for a phosphate reserve. These phosphate reserve withdrawals were reviewed under the BLM's withdrawal review program and the Butte District Office recommended they be dropped. Phosphate lease M012510 encompasses 559 acres in the Sheep Station south of Sheep Mountain and north of the Idaho border. Phosphate leases on the Idaho side include 606 acres in a preference right lease and 1,041 acres in a competitive lease for a total of 1,647 acres.

Section 4(a)(3) of the 1964 Wilderness Act withdraws all designated wilderness lands from mineral entry or leasing after December 31, 1983. If all or any portion of the Centennial Study Area is designated wilderness, any opportunity for locatable and saleable mineral development will be foregone.

Mineral Resource Projections

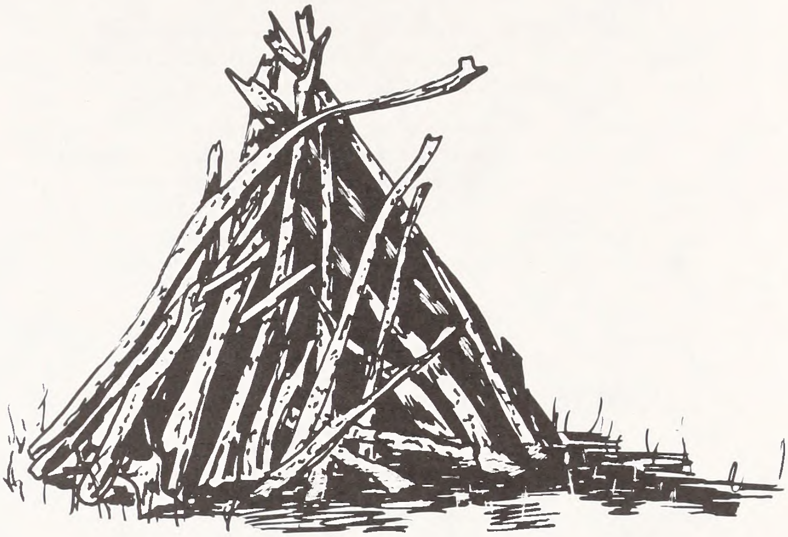
As discussed above, the Centennial Mountains have large resources of phosphate. The phosphate deposits are near the crest of the range in areas of relatively gentle terrain with little timber. Mining done in the 1950s was surface mining, any future mining will be primarily underground mining. Supply and demand forecasts by the Bureau of Mines for the foreseeable future indicate a surplus of phosphate in the domestic economy. Phosphate for fertilizer is expected to have a 1.5 percent per year growth rate in domestic markets and a 2.7 percent per year growth rate in export. The high mining costs, long distance to likely markets, and climatic conditions combine to make the deposits unattractive at the present time. Any development of the phosphate resources in the Centennial Mountains is unlikely before the year 2000.

The potential for oil and gas is low to moderate with only indirect evidences of the possible existence of oil and gas recources. (See Appendix D.) The potential for decorative stone is moderate but long truck hauls and the short operating season will likely limit development.

The potential for other mineral resources, industrial minerals, base and precious metals, oil shale, and geothermal energy is low to moderate.

CULTURAL

Cultural surveys on the northern slope and on the Continental Divide of the Centennial Mountains has been undertaken mainly from random sample inventory conducted during the Mountain Foothills Grazing Environmental Impact Statement (USDI, BLM 1980). Information about cultural resources in the study area has been collected mainly from clearances conducted for range projects and survey of the proposed Continental Divide National Scenic Trail. Only a small portion of the study area has been examined to date.



Evidence of Paleo-Indian occupation dating back 10,000 to 14,000 years has been found adjacent to the study area within the Centennial Valley and on the Snake River Plains. The prehistoric inhabitants were hunter-gatherers. They shifted residence in response to seasonal climatic changes in the availability of food. They lived in small family groups and fashioned their utensils from stone, hide, bone, and wood. Much of the stone was secured from the local obsidian and ignimbrite deposits. Bighorn sheep and bison were the desired sources of food, hide, and bone. The remaining traces of these occupants include isolated tools, scatters of chipped stone, and campsite remains.

In total 26 cultural resource sites have been identified in the study area. They include one conical timber lodge, one semi-circular rock ring, one small rock alignment, five stone quarry workshops, seventeen surface lithic scatters related to stone tool manufacture and food gathering-preparation activities, and one log cabin ruin.

The study area was not homesteaded, and historic use has been limited to grazing, hunting, and mining. About 12 mining claims or claim groups have been located within the study area since 1896, mostly from 1950 to l974. Most were lode claims, presumably for gold; and workings consist only of a few prospect pits. One claim for coal was filed in 1912 and included a 110-foot shaft. It produced a few tons of coal for use at the school at Kilgore, Idaho. Trails, water troughs, hearths, and occasional dumps indicate sheepherder's activities.

Despite the low number of recorded sites, the archaeological potential of the study area is high. Areas lower on the slopes of the Centennials have been more intensively surveyed. These surveys show that the mountains were heavily used. Abundant supplies of wildlife, camas (a staple food plant), and obsidian-ignimbrite sources were attractive to the Indians. The Centennials also lie across the route from the Snake River Plains to the Great Plains, which was used by Indians living in both areas. More information on how the Indians adapted to mountain environments and to each other probably lies buried in the sites within the study area.

VISUAL RESOURCES

The Centennial Mountains provide some of the highest quality scenic values in southwestern Montana. The landscape has high, rugged, forested mountains. The dramatic 3,000-foot rise of the northern face is a well known landmark in southwestern Montana. The southern face of the range is less spectacular; moderately steep, broad open ridges are separated by conifer covered drainages.

The Centennials are part of the Northern Rocky Mountain physiographic province (Fenneman 1938).

WATER AND SOILS

Surface Water

The snow pack that accumulates on the study area is an important contribution to the overall water balance. Snowmelt begins in April and peaks in late May or mid June. The average snowpack water content is 35 inches.

The snowmelt on the Montana side drains into the Red Rock River, which has very hard water containing calcium bicarbonate with moderate sulfate, sodium, magnesium, and chloride concentrations. Lead, zinc, cadmium, and copper are present in low concentrations. Recorded low flow turbidities are significantly higher than in other major streams in southwest Montana. Highly erodable soils compounded by historic overgrazing on the public lands increase the turbidity levels. Water temperatures are suitable for the propagation and growth of salmonids and associated aquatic life (Mt. DHES 1980).

The Water Quality Bureau data (Mt. DHES 1982) for the Red Rock River above Lima Reservoir shows that excess suspended sediment, nitrogen, and phosphorous levels are deteriorating the water quality to the point that aquatic life and recreational uses are suffering. More specifically, data collected on Odell Creek in Section 31, show an elevated suspended sediment concentration of 35 milligrams per liter (mg/l). This value is above the concentration of 25 mg/l which is known not to cause adverse effects on aquatic life (Zucker 1972). The data also shows total coliform levels above the Montana average.

On the Idaho side, water quality is excellent except for sediment from minor road erosion and the phosphate mining in Taylor Creek. About 15,000 acres are closed to livestock grazing for watershed improvement. These projects include contour trenches to reduce sheet and rill erosion in Taylor Creek and the East Fork of Hotel Creek. A reclamation plan is being written for the phosphate mining and will be implemented in 1985 or 1986.

Ground Water

The intermontane basin in which the Red Rock Lakes lie contains tertiary alluvium deposits which yield a moderate amount of water. The timbered slopes of the Centennial Mountains are important recharge areas for this aquifer. The Centennials are classified as highly productive, meaning that they can naturally recharge or replenish groundwater supply by allowing moisture to infiltrate the ground (USDA, FS 1987). Ground water quality varies, but is generally of good quality (240 to 400 mg/l dissolved solids) (Pettyjohn, et al 1979).

Soils

Six major soil types are found in the Centennial Mountains. Appendix E summarizes their characteristics and the Soils Map shows their location.

Thirteen percent of the study area has formed on limestone. These soils are cold, often calcereous to the surface, shallow to deep, coarse textured, and range from moderately steep to very steep sideslopes and ridgetops on forested and open grasslands. Rock outcrops, talus slopes, and bare scarps are common. These soils are stable with low to moderate compaction hazard but moderate to severe erosion hazard. Their revegetative potential when disturbed is low to moderate.

Soils formed from Tertiary volcanics cover 33 percent of the study area. They are cold, usually forested, moderately deep to deep, coarse textured, and range from nearly level to steep on strongly dissected slopes. They are typically stable with low to moderate compaction hazard, but moderate to severe erosion hazard due to their coarse textures. Their revegetation potential when disturbed is low to moderate.

There are two exceptions. The extreme eastern end of the study area is weakly to moderately dissected scarp lands with scattered noncommercial timber interspersed with rock outcrops, rocky ridges, and talus slopes. Slopes are highly variable but range between 5 to 65 percent.

The other exception is north of the Centennial Divide on the west end of the study area. These soils are more developed than the other volcanic derived soils. Consequently, they are typically fine textured and deep with high available water capacity and high revegetative potentials on cut and fill slopes. Slump and compaction hazards are high however, and erosion hazards are moderate to severe.

Soils formed from Cretaceous and Tertiary sediments cover 32 percent of the study area, primarily on the west end. These soils range from shales and siltstones with interbeds of sandstones. These are mostly cold, fine textured soils and range from nearly level ridgetops to steep moderately dissected side slopes under herbaceous or forest vegetation. Past landslide activity has caused hummocky and step-like relief with wet areas in some depressions. These soils have a high to very high slump hazard and will move when support is removed. Erosion hazard is moderate to severe, depending on slope; and the compaction hazard is high due to the fine soil textures. Their revegetative potential is low to high.

Eleven percent of the study area has formed on sandstone and quartzites. Soils are cold, droughty, usually coarse textured and range from gently sloping to steep open grasslands. Where slopes are gentle, soil textures are fine and deep and support some timber stands. The phosphate mines are located within this soil type. These soils are generally stable with low to moderate compaction hazards but moderate to severe erosion hazards depending on slope. Revegetative potential is low to high depending on slope and available water capacity. Rock outcrops are common.

Soils formed in Quaternary deposits make up six percent of the study area. These soils occur within the Volcanic, Cretaceous, and Tertiary sediments, and therefore represent a wide range of soil characteristics and vegetative types. These soils are composed of granules to boulders in the unconsolidated to semiconsolidated matrix of clay, silt, and sand. The topography varies from hummocks to steplike to a cluster of narrow sinuous ridges separated by deep narrow drainages. These soils are unstable and require great care when harvesting timber and constructing roads. Anything that might add weight to or remove support from these soils will increase their vulnerability to mass movement.

The soils formed on Precambrian Metamorphics are on five percent of the study area and occur in the eastern portion primarily on and around Nemesis Mountain. They are shallow to moderately deep, steep to very steep, cold, coarse textured and droughty. There is some timber but most is scattered and noncommercial. These soils are generally stable with low compaction hazards but moderate to severe erosion hazard. Revegetative potential is low to moderate depending on slope and available water capacity. Rock outcrops are common.

More detailed soils information is available from the respective land management agencies.

GRAZING MANAGEMENT

The study area has been grazed with herded sheep since the 1890s. This use peaked in the 1920s resulting in overgrazing of the study area. Sheep grazing has been reduced by 70 percent by agency and permittee cooperation to halt overgrazing. Due to the decline in the sheep industry several sheep allotments have been in nonuse at least one year out of the past five. There have been requests to convert some allotments from sheep to cattle. Such a conversion would require two to five miles of drift fence added in the study area.

In the 1960s, permittees in Montana began changing to cattle operations. Several sheep grazing areas were removed from allotments. Forest encroachment, management practices, and fire suppression have led to reduction in the capacity of these areas for stockgrazing. Current management strives to provide suitable habitat for both livestock and wildlife.

The Sheep Station is the last sheep operation on the Montana side of the study area. In recent years there has been some renewed interest in sheep allotments, but no applications have been filed for grazing permits in the Centennial Mountains.

The BLM grazing allotments are on the fringes of the study area. They include private land and, in some cases, other public land outside of the study area within the same pasture. In some cases, the permitted authorization in the study area occurs to avoid having to build fences between public and private land. In these cases, livestock grazing on the public land was less of a concern than the hazard that a fence presents to game movement.

Allotment Summary

Currently, 2,440 AUMs are leased for grazing sheep and cattle. Table 3-2 lists the grazing allotments, season of use, and management strategies.

TABLE 3-2

GRAZING ALLOTMENTS IN THE CENTENNIAL STUDY AREA

Grazing Allotment	Season	Class of Stock	Management Strategy
Pete Creek	July - October	Cow/calf pairs and yearling cattle	Deferment - pasture level stocking
Shambow Unit	July - October	Yearling cattle	Alternating rest
Duff Creek	July - October	Yearling cattle	Refuge lead: 3-treatment rotation, incidental to larger refuge area
Red Rocks	July - September	Cow/Horse	Incidental to private land
Tom Creek	May - November	Cow/calf pairs	Incidental to private land
Morton	May - November	Varies	Incidental to private land
Davis	June - October	Varies	Incidental to private land
Ching Creek	July - August	Sheep	Deferred rotation based on herding
Coal mine	July - September	Sheep	Deferred rotation based on herding
Cottonwood Lake	July - September	Sheep	Deferred rotation based on herding
Little Creek	July - September	Sheep	Deferred rotation based on herding
Saw Creek	July - September	Sheep	Deferred rotation based on herding
Table Mountain	July - September	Sheep	Deferred rotation based on herding
Blue Creek	July - August	Sheep	Deferred rotation based on herding
Carrot-Taylor	July - August	Sheep	Deferred rotation based on herding
Coffeepot	July - August	Sheep	Deferred rotation based on herding
Hotel Creek	July - August	Sheep	Deferred rotation based on herding
Ice House-Willow Creek	July - August	Sheep	Deferred rotation based on herding
Myers Creek	July - September	Sheep	Deferred rotation based on herding
Snyder Creek	July - August	Sheep	Deferred rotation based on herding
High Five	July - September	Cattle	Deferred rotation based on pastures

VEGETATION

The study area has mollic-type soils (generally associated with grasslands) identified under what is currently conifer forest. Forest habitat types are Douglas-fir and western spruce, fir. Some enchoachment of conifers has occurred on grasslands as a result of fire suppression and other influences.

Other vegetative types include mountain meadows and parks, sagebrush-grasslands, aspen communities, and riparian communities. Some areas are extremely steep with rock cliffs and ledges that have only minor amounts of vegetation.

Aspen groves and riparian communities occur throughout the study area. These communities serve as areas of conflict amongst game, watershed, aesthetic, and livestock resources as well as provide important edges for wildlife and livestock. Diversified vegetation in these communities provides important habitat for big game.

The sagebrush-grassland, mountain meadows, and parks are interspersed throughout the study area associated with particular land features. There are no expansive areas of these vegetative types; however, they furnish important forage for game and livestock. These vegetative communities are probably declining but prescribed fire under existing fire management plans is expected to reverse this trend in the long run.

Noxious and Poisonous Plants

Noxious weeds are not currently a problem in the Centennial Study Area. However, Canada thistle, musk thistle, and houndstongue can be found. Infestation of knapweed is spreading into southwestern Montana and may soon appear in the Centennial Valley. Noxious weeds are readily spread by livestock, wildlife, and vehicles traveling between infested and uninfested areas.

Tall larkspur is found in the Centennial Study Area. This plant is poisonous to cattle but not to sheep. With careful planning, sheep can be used to control tall larkspur and reduce the risk of poisoning to cattle.

Fire Suppression

Wildfires have occurred in the study area at intervals of 22 to 40 years (Arno 1983). Fire management options of the future will include prescribed fire, wherein natural ignitions will be allowed to burn under prescribed conditions, and fuel modification which will likely affect the occurrence of wildfires. Wildfires in the BLM portion of the Centennial Mountains will be managed as prescribed in the Fire Management Plan for the Dillon Resource Area (USDI, BLM 1984a) The Targhee National Forest portion will be managed under guidelines in the High Country Fire Management Plan, (USDA, FS 1985b). The Beaverhead National Forest portion will be managed under the Beaverhead National Forest Fire Management Plan (USDA, FS 1986a).

WILDLIFE

Wildlife found in the study area are fairly typical of the spruce, fir habitat types in southeastern Idaho and southwestern Montana mountains. The severe winter climate and deep snows preclude winter use by most big game species with the exception of bear, moose, and elk in the extreme western portion. The area is exceptional in diversity of management priority species, including 13 species of special interest or concern listed by the Montana Department Fish, Wildlife and Parks (MDFW&P 1984), and 5 species listed by Idaho (IDF&G 1984). (See Tables 3-3 and 3-4.)

Big Game

Mule deer are common throughout the study area during spring, summer, and fall. None winter in the study area and winter movements are poorly documented. Some deer are known to move northwest to winter in the Red Rock River drainage. Summer habitat quality is excellent on the Montana side, due to mesic conditions and an abundance of high quality forage plants. The quality and quantity of shrub species limit the Idaho side to less then optimum conditions for mule deer.

TABLE 3-3

WILDLIFE OCCURRENCE & RELATIVE ABUNDANCE IN THE MONTANA SIDE OF THE CENTENNIAL STUDY AREA

Species	Season	Habitat		Abundance
		Existing	Potential	
BIG GAME				
Mule deer	Summer	30,000 ac.	30,000 ac.	Common
Elk	Summer	30,000 ac.	30,000 ac.	Common
Elk	Fall-migrational	13,200 ac.	13,200 ac.	Abundant
Elk	Fall-winter	3,600 ac.	3,600 ac.	Common
Moose	Yearlong	25,000 ac.	25,000 ac.	Abundant
Black bear	Yearlong	30,000 ac.	30,000 ac.	Abundant
UPLAND GAME BIRDS				
Blue grouse	Yearlong	30,000 ac.	30,000 ac.	Common
Ruffed grouse	Yearlong	3,000 ac.	3,000 ac.	Common
Spruce grouse	Yearlong	15,000 ac.	15,000 ac.	Uncommon
NONGAME				
Wolverine*	Yearlong	Unknown	Unknown	Rare
Canada lynx*	Yearlong	30,000 ac.	30,000 ac.	Uncommon
Hoary marmot*	Yearlong	Unknown	Unknown	Unknown
Great Gray Owl*	Yearlong	Unknown	Unknown	Unknown
N. Goshawk*	Summer	Unknown	Unknown	Uncommon
Sharp-shinned hawk*	Summer	Unknown	Unknown	Uncommon
Cooper's Hawk*	Summer	Unknown	Unknown	Uncommon
Long-eared Owl*	Summer	3,000 ac.	3,000 ac.	Common
Prairie falcon*	Summer	5,000 ac.	5,000 ac.	Common
Golden Eagle*	Summer	6,000-10,000 ac.	6,000-10,000 ac.	Common
Dwarf shrew*	Yearlong	Unknown	Unknown	Unknown
THREATENED—ENDANGERED				
Peregrine falcon	Summer	1,500 ac.	5,000 ac.	Uncommon
Grizzly bear	Yearlong	25,526 ac.	30,000 ac.	Uncommon
Wolf	Summer	0 ac.	30,000 ac.	Uncommon
FISHES				
Westslope cutthroat trout*	Yearlong	5.5 mi.	14 mi.	Common
Brook trout	Yearlong	2.6 mi.	14 mi.	Common
Grayling*	Yearlong	0 mi.	4 mi.	Common
Grayling*	Spring	0 mi.	8 mi.	Common
Yellowstone cutthroat trout*	Yearlong	1 mi.	14 mi.	Uncommon

*Species of special interest or concern, Montana Department of Fish, Wildlife and Parks.

Mule deer summering in the study area are probably limited by winter habitat quantity and quality within a reasonable migration distance.

Elk are common, particularly in the western one-half of the study area where the best habitat occurs. The Centennial Mountains provide habitat for an important interstate (Montana, Idaho) elk herd. A large number of elk summer in the Centennial Mountains in both Montana and Idaho. During late fall, an estimated 300 to 500 elk, many of which summer in Idaho, utilize the western portion of the study area in Montana as a migrational staging area. Many elk from the interstate herd winter in Idaho on the Sand Creek winter range. Radio telemetry studies by the Montana Department of Fish, Wildlife and Parks (MDFW&P) have documented migrations from this area, northward to the Blacktail Game Range and the Basin Creek area.

During mild, open winters, elk remain on lower portions of the migrational area and utilize about 3,600 acres of the study area as winter habitat. The primary, normal year, winter habitat occurs immediately west of the study area. The study area supports 75 to 100 elk in severe winters and as many as 300 in open winters.

TABLE 3-4

WILDLIFE OCCURRENCE AND RELATIVE ABUNDANCE IN THE IDAHO SIDE OF THE CENTENNIAL STUDY AREA

Species	Season	Habitat		Abundance
		Existing	Potential	
UNGULATES				
Mule Deer	Summer/Fall	42,000 ac.	42,000 ac.	Common
Elk	Summer/Fall	42,000 ac.	42,000 ac.	Common
Moose	Yearlong	42,000 ac.	42,000 ac.	Common
CARNIVORES				
Black Bear	Yearlong	42,000 ac.	42,000 ac.	Common
Coyotes	Yearlong	42,000 ac.	42,000 ac.	Common
Wolverine*	Yearlong	Unknown		Rare
Fisher*	Yearlong	Unknown		Rare
AVIAN				
N. Goshawk	Spr-Sum-Fall	39,000 ac.	39,000 ac.	Common
Sharp-shinned Hawk	Spr-Sum-Fall	2,000 ac.	2,000 ac.	Common
Coopers Hawks	Spr-Sum-Fall	2,000 ac.	2,000 ac.	Common
Blue Grouse	Yearlong	42,000 ac.	42,000 ac.	Common
Ruffed Grouse	Yearlong	4,000 ac.	4,000 ac.	Common
Prairie Falcon	Summer	4,000 ac.	4,000 ac.	Rare
Great Grey Owl	Spr-Sum-Fall	35,000 ac.	35,000 ac.	Uncommon
Spruce Grouse	Yearlong	Unknown		Uncommon
THREATENED—ENDANGERED				
Peregrine Falcon	Spr-Sum-Fall	3,000 ac.	3,000 ac.	Rare
Grizzly Bear	Yearlong	23,000 ac.	23,000 ac.	Rare
FISHES				
Cutthroat Trout	Yearlong	3 Lakes		Common
Brook Trout	Yearlong	8 Miles		Common

*Species of special interest or concern, Idaho Department of Fish and Game.

The Centennial Mountains and the Red Rock Refuge support an important interstate (Montana, Idaho) moose population. Moose migration has been documented from both Henrys Lake and Junipers-Big Bend in Idaho to the Red Rocks Refuge in Montana (Ritchie 1978).

Moose are abundant throughout the study area, particularly in riparian vegetation along the numerous drainages and in the spruce, fir habitat types. Moose use the study area quite intensively during the summer. Winter use is much less intensive, with about 15 to 25 moose remaining on the study area.

The majority of the moose summering in the study area may winter on the Red Rock Lakes Refuge. Some may move south into Idaho to winter off the study area. Moose remaining yearlong probably represent a distinct resident population as opposed to those which migrate significant distances to wintering habitats. Moose hunting occurs throughout the Centennials but the late hunt occurs exclusively on lands managed by Fish and Wildlife Service.

Black bear are abundant yearlong inhabitants of the entire study area. Bear observations and signs are very common, and the study area is considered good quality habitat. Black bears are often seen during spring and fall in low elevation, riparian areas and aspen woodlands. Intensive fall use occurs in whitebark pine stands, where bears raid squirrel caches.

Bighorn sheep historically inhabited the study area and were probably wiped out by domestic sheep grazing about the turn of the century. Presence of skulls to this date suggests that bighorn were probably abundant. Suitable habitat remains; however it is believed that, historically, bighorn probably migrated to suitable winter habitats. Restablishing historical migrations is not practical at this time. For this reason, the introduction of possibly nonnative mountain goats was approved in the 1979 Management Framework Plan (USDI, BLM 1979). Goats would be better suited to wintering on the study area. There have been occasional recent sitings of mountain goats.

Upland Game Birds

Three species of forest-dwelling grouse; blue, ruffed, and spruce (Franklins); inhabit the study area. Blue grouse and ruffed are common, and spruce are uncommon. Blue grouse prefer Douglas-fir associations, especially forest edges. Ruffed grouse prefer riparian sites with decidious woody compositions and aspen woodlands. Spruce grouse occur primarily in the spruce, fir forests.

Nongame Species

Species of special concern that are known to inhabit the study area include wolverine, Canada lynx, northern goshawk, sharp-shinned hawk, Cooper's hawk, long-eared owl, prairie falcon, and golden eagle. The hoary marmot and great grey owl have been seen in the study area but their status is unknown. The dwarf shrew is expected to occur in rocky, alpine habitats but has not been verified. Other nongame species found in the study area are listed in Tables 3-3 and 3-4.

Threatened and Endangered Species

Grizzly Bear

Grizzly bears (threatened) inhabit the study area, however the area was not recognized in the recovery plan (Brown 1982) as occupied territory. BLM has 16 reliable grizzly observations on the Montana side for the 1974-84 period. Some observations were made by biologists for BLM, the Fish and Wildlife Service, and the Interagency Grizzly Bear Study Team (IGBST). There are three confirmed and two unconfirmed grizzly bear observations on the Idaho side for the 1975-84 period. The confirmed sighting met the IGBST guidelines. About 25,300 acres in Idaho are designated as Situation 2 grizzly bear habitat as defined by the IGBST guidelines. Situation 2 contains suitable habitat in which grizzly bears are known or highly suspected to occur but about which there is inadequate information to classify the habitat as necessary for recovery of the species.

The study area contains the diversity of habitat components apparently used by grizzlies in the Yellowstone Area (Blanchard and Knight 1978). Dense timber for cover and abundant food producing meadows and riparian stands are present. Whitebark pine stands and squirrel caches are present above 8,500 feet and are utilized for fall foraging.

Telemetry studies by the IGBST in Yellowstone indicate that the study area by itself is too small to support a discrete population of grizzlies (Blanchard & Knight 1978). Based upon a reconnaissance inventory by the IGBST for BLM in 1978, they concluded that the Centennial Study Area is suitable for grizzly bear habitat when considered as a part of the Yellowstone population.

Peregrine Falcon

Peregrine falcons (endangered) inhabit the study area as a result of reintroduction efforts funded by BLM, Forest Service, and Fish and Wildlife Service in the last five years. Captive-raised peregrines were provided and cared for by the Peregrine Fund under contract to the federal agencies and with the cooperation of the Montana Department of Fish, Wildlife and Parks. One pair of the reintroduced peregrines has returned to the study area to successfully nest and fledge young, and represents one of only two known active eyries in Montana. Suitable nesting habitat is found near Taylor Mountain, Mt. Jefferson, and Sawtell Peak. The study area is an essential component of the peregrine recovery effort and reintroduction efforts will continue for at least five years.

Bald Eagle

Bald eagles (endangered) are found in the upper reaches of the Beaverhead drainages in Montana and the Henry's Fork drainage in Idaho. This population of bald eagles is designated as the Continental Unit in the *Bald Eagle Mangagement Plan for the Greater Yellowstone Ecosystem* (WGFD 1983).

There is an active nest site on BLM-managed land just outside the boundaries of the Centennial Mountains wilderness study area. However, no nest sites have been found inside the study area. The eagles are primarily associated with the wet lands in the mountain valleys.

Wolf

There was evidence of sporadic wolf (endangered) use in the study area during the 1960s and early 1970s. No observations have been recorded during the past 10 years, and wolves are not believed to presently inhabit the study area.

Plants

Several plant inventories of the Centennial Mountains have found no plant species currently listed as endangered or threatented by the Fish and Wildlife Service (USDI 1987). These inventories were conducted on the Sheep Station (USDI, BLM 1968), on the Centennial Mountains Instant Study Area (Lowry 1979), and on the Red Rock Lakes and Centennial Mountains area (Dorn 1968 and Lesica 1984).

Fisheries

Fisheries are confirmed in fourteen streams and unverified in two streams, totaling about 23 miles of stream habitat. These are characteristically small, steep-gradient headwaters streams. There are three lakes with trout. These are periodically restocked by the Idaho Fish and Game. Historically, grayling inhabited 15 miles of stream and westslope cutthroat inhabited 9 miles of stream within the study area. Both are species of special interest and concern. Westslope cutthroat occupancy has declined to 5.5 miles and grayling no longer inhabit the study area.

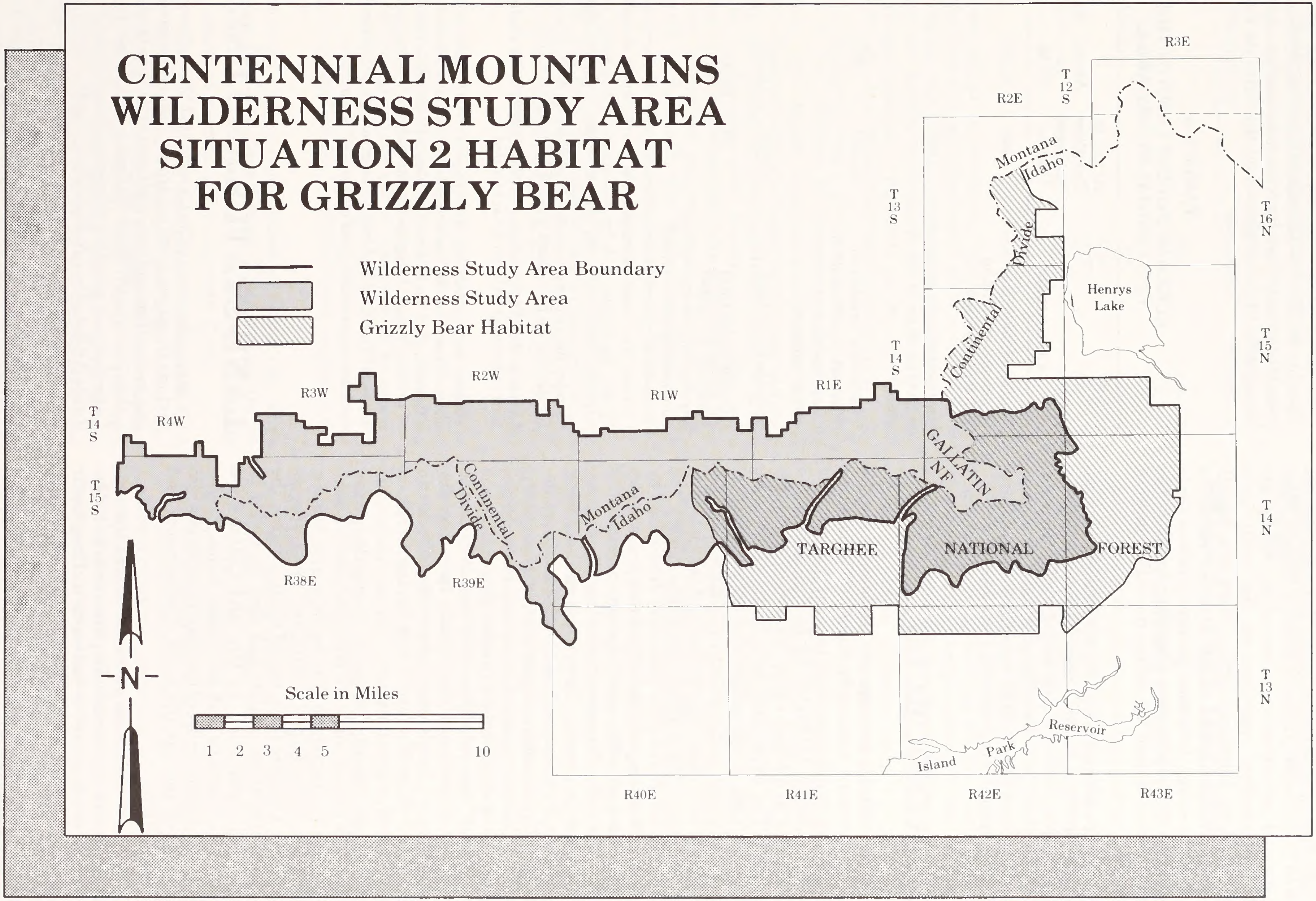
Introduced brook trout inhabit three streams and Yellowstone cutthroat trout inhabit two streams within the study area. The Yellowstone cutthroat have hybridized with the endemic westslope cutthroat. Unhybridized westslope cutthroat remain in five streams.

The commencement of irrigation diversions, poor grazing practices, and introductions of nonnative fishes in the adjoining Centennial Valley at about the turn of the century led to the rapid decline of native fishes. As late as 1915, grayling were still abundant in portions of the Centennial Valley (Nelson 1954). By the 1950s, grayling spawning runs had diminished to a few tributaries downstream of the study area.

Presently, one of Montana's few relict native grayling populations inhabits Upper Red Rock Lake on the adjoining Red Rock National Wildlife Refuge. This population ascends Red Rock Creek, just below the study area, to spawn. The study area thus contributes greatly to the maintenance of this grayling population by providing the entire watershed for Red Rock Creek.

There is good potential for the re-establishment of endemic westslope cutthroat on about nine miles of stream. There is potential to re-establish grayling spawning on about eight miles of stream, however this would be accomplished primarily through management practices off the study area.

CENTENNIAL MOUNTAINS WILDERNESS STUDY AREA SITUATION 2 HABITAT FOR GRIZZLY BEAR


Wilderness Study Area Boundary
Wilderness Study Area
Grizzly Bear Habitat
R4W
R3W
R2W
R1W
R1E
R2E
R3E
T 14 S
T 15 S
T 13 S
T 12 S
T 16 N
T 15 N
T 14 N
T 13 N
R38E
R39E
R40E
R41E
R42E
R43E
Continental Divide
Montana
Idaho
GALLATIN NF
TARGHEE
NATIONAL
FOREST
Henrys Lake
Island Park Reservoir
Scale in Miles
1 2 3 4 5 10
N

Red Rock Lakes Wildlife Refuge

The study area greatly influences the wildlife values on the adjoining Red Rock Lakes National Wildlife Refuge. Most of the fishery and waterfowl resources of the refuge are influenced by watershed resources on the study area (Greater Yellowstone Coalition 1986). There is a highly significant relationship between seasonal moose use on the study area and the refuge. Likewise, peregrine falcon use is interrelated, with the study area providing most of the suitable nesting habitat and the refuge providing most of the prey base.

The wildlife refuge contains a significant number of trumpeter swans, presently a stable summer breeding population of approximately 60 to 80 birds amd a wintering population of about 250 to 350. Offsite factors, such as human disturbance, may have a bearing on trumpeter swan survival but the interrelationship is not clear at present.

FOREST RESOURCES

The predominant habitat types in the study area are the Douglas-fir and western spruce, fir forests. Within these general forest types, vegetation tends to occur in zones. The distribution of zones is controlled by factors associated with elevation and to a lesser extent by aspect and topographic position. The uppermost zone is the alpine zone characterized by hardy communities of short growing season grasses and stringers of scattered Douglas-fir, subalpine fir, and whitebark pine. This zone can be seen near the Continental Divide in the highest elevations. Below the alpine zone is the subalpine zone generally dominated by climax subalpine fir interspersed with forb and grass meadows and sagebrush parks. The montane zone occurs below the subalpine zone and is characterized by a predominance of mature Douglas-fir stands. On the warmer southerly aspects, the montane zone occasionally extends to the Continental Divide. The subalpine zone also extends to the montane on northerly exposures, covering these slopes with dense stands of shade-tolerant subalpine fir. On the lower elevations of the subalpine and montane zones, lodgepole pine is a seral species, quickly invading disturbed sites such as the headwaters area of Kay Creek and Ching Creek below Slide Mountain and Spring Creek on the extreme east end of the study area. The species is quite frost hardy and can remain dominant on gentle terrain where air drainage is poor and cold temperatures are common. This occurs in numerous flat saddles and basins. Aspen is another disturbance stimulated seral species which occurs with Douglas-fir in mixed stands within the montane zone. Pure aspen stands can also be found in many of the drainages, such as Dry and Cottonwood creeks, in both the montane and subalpine zones. Englemann spruce occurs along most of the major drainages and in wet, boggy areas such as the Coon, Cottonwood, and Kay Creek watersheds.

A variety of insect and disease problems plague the timbered stands, however, the mountain pine beetle in lodgepole pine and the western spruce budworm in Douglas-fir and subalpine fir are the most significant and destructive. Most susceptible host lodgepole pine have been killed by the bark beetle during the recent epidemic of the 1970s and early 1980s. Defoliation by western spruce budworm has been aerially detected since 1975 through 1983 at moderate to high levels but showed abatement to a low level in 1984, according to Forest Service Pest Management Surveys. This insect has seriously affected cone production in Douglas-fir. Table 3-5 displays forest land productivity and suitability for timber harvest information. Areas covered by suitable timber is shown on the Suitable Timber Map.

TABLE 3-5

ACRES OF FOREST LAND IN THE CENTENNIAL STUDY AREA

Component	Acres in Targhee National Forest	Acres in BLM	Acres in Beaverhead National Forest
Nonforest land (less than 16 percent crown and canopy coverage)	924	6,492	1,719
Unproductive forest land (less than 20 cu. ft./ac./yr. growth	9,475	0	0
Unsuitable forest land (Harvest would result in unacceptable soil/water resource damage)	15,480	969	1,900
Suitable forest land	19,571	18,255	855
Suitable forest land available for timber harvest (As determined by land management plans)	0[1]	13,200[2]	0[3]

[1] Under the *Land Management Plan for the Targhee National Forest*, no timber will be harvested in the study area. Timber harvest could occur only after revision of the management plan.

[2] Under the *Dillon Resource Area Management Framework Plan*, timber will be harvested west of Matsingale Creek.

[3] Under the *Forest Plan for the Beaverhead National Forest*, timber harvest will not be scheduled.

Mature predominately Douglas-fir sawtimber stands occupy about 80 percent of the suitable forest land acreage and mature lodgepole pine stands occupy about 10 percent. Immature stands of predominately Douglas-fir and lodgepole pine occur in various stages of development on the remaining suitable forest land acreage. Yields of 2.64 mmbf/year are projected for the next four decades on a standing volume of 128.5 mmbf.

LAND STATUS AND USE

On land adjacent to the Centennial Study Area, land uses include livestock grazing, timber harvest, tourist sightseeing, recreation and management activities on the Red Rock Lakes National Wildlife Refuge, a small resort operation at Lakeview and possibly some small scale hard rock mining. Table 3-6 lists the landowners along the study area boundaries and the Land Status map shows the ownership patterns in the area. Low potential exists for a major phosphate mining operation within the study area in the next 50 to 100 years. Other industrial activities are unlikely near the area in the foreseeable future.

TABLE 3-6

LAND OWNERSHIP ALONG THE BOUNDARY OF THE CENTENNIAL STUDY AREA

Ownership	Mile of Boundary	Percent of Boundary
State	6	4
BLM	18.5	13
Forest Service	91.0	62
Red Rocks Lakes National Wildlife Refuge	9.5	6
Private	22.0	15
Total	147.0	100

The Department of Agriculture's Agricultural Research Service operates a sheep experiment station on a 16,650-acre withdrawal (#EO3767) located in two separate parcels. These lands are subject to whatever development is necessary for sheep experiment purposes as the Agricultural Research Service has full management jurisdiction.

The state of Montana owns 1,160 acres in two parcels in T. 14 S., R. 1 & 2 W., Section 36. State lands are subject to development and access requirements outside federal jurisdiction. State inholdings are open to mineral and grazing leasing, and access to the inholdings would be across public lands in the study area. Montana has indicated a desire to exchange these parcels if the adjacent study area is designated wilderness. An exchange of T. 14 S., R. 1 E., Sec. 36 and T. 14 S., R. 3 W., Sec. 36 was completed in 1988 (USDI, BLM 1988). The remaining sections will be part of an exchange agreement in the future.

A parcel of BLM land of 228.07 acres has been leased in T. 14 S., R. 2 W., Sec. 26 for purposes of a small ski resort which is presently not being used. A lodge building and a rope tow lift are within the leased area. This lease is under authority of Section 302 of FLPMA and is adjacent to the Centennial Study Area.

Executive Order of October 9, 1917 established Phosphate Reserve 30 Montana 7 which includes 3,092.51 acres within the Centennial Study Area. A portion of this identified phosphate reserve, 2,349.5 acres, is under lease.

Approximately 12,785 acres of the Centennial Mountains are under oil and gas lease, a further 1,221 acres are under oil and gas lease application, and 8,045 acres are part of the simo tracts.

Sixteen mining claims encompassing about 160 acres make up the Tin Cup Claim Group. These claims are for building stone and the claimants have been operating under an approved operating plan for some time.

In March 1985, as part of the First Continental land exchange, BLM acquired a total of 7,500 acres in the Centennial Valley which are directly contiguous to the western edge of the Centennial Study Area. These lands were acquired through a land pooling process which traded BLM scattered tracts primarily in the Beaverhead and Madison Counties in exchange for the 7,500 acres. Although BLM is not studying acquired lands for wilderness, these lands may be considered by Congress when it examines the agencies' wilderness recommendations in the Centennial Mountains.

The J.R. Simplot Company is considering releasing their leases in the Centennial Mountains for lands subject to an exchange lease arrangement near their Soda Springs lease holdings.

SOCIAL CONDITIONS

Local Attitudes and Perceptions

Residents of the area exhibit attitudes and values typical of rural, ranch-oriented societies in the western United States. The rural character of the area is what residents value most about their lifestyle. Specifically, they appreciate the wide open spaces, naturalness, fresh air, and solitude. The personal characteristics of other local people (friendliness, independence, and industriousness) were frequently mentioned as positive aspects. The residents also valued the lifestyle offered by the local communities: knowing everyone else, the lack of urban problems, relaxed pace, and personal freedom. They feel their area is a good place to raise children and, not surprisingly, every respondent wanted to maintain this lifestyle and the traditional land uses of the area.

Many residents feel the biggest threats to their lifestyle are government interference with local ranches, wilderness designation, high taxes, inheritance taxes, and diverting the use of public lands to wildlife or recreation. They want the land controlled at the local level and resent interference from outside the area, whether from agencies or special interest groups. Thus, any change in the status quo proposed by governmental agencies would be questioned.

Sources of information for this section include sections of a 1980 survey by ABT Associates, public meetings, and letters from interested persons. Much of the discussion specific to this study area is based on information received from those who took the initiative to make their views known. It is assumed that the attitudes of other area residents would be similar. The importance of these views is reinforced by an Opinion Research Corporation survey completed in 1978. Over 55 percent of a national sample felt the decision about wilderness should be made by the citizens of the states affected.

State Attitudes Concerning Wilderness

The results of a recent statewide poll (Wallwork 1984) indicate that Montanans overwhelmingly approve of the concept of setting aside certain public and state lands as designated wilderness areas. They like the idea of preserving an area from development so that it will be available to future generations. There appears to be widespread support for established wilderness areas among all kinds of Montanans. Regardless of age, sex, political preference, or place of residence, more than 75 percent of the respondents said they favored wilderness areas. About 40 percent of the Montanans surveyed favored the addition of more wilderness areas in the United States. However, only 25 percent said that Montana needs more wilderness areas. There were no major differences in opinions concerning wilderness between those living in eastern Montana and those in western Montana, where most of the state's wilderness areas area located.

Information on attitudes in Idaho is less current than that for Montana. That information which exists shows similar attitudes toward protecting the environment but less support for the designation of wilderness. Of a sample made in 1978, 55 percent of those Idahoans questioned felt that Idaho already has a sufficient supply of wilderness.

National Attitudes Concerning Wilderness

National opinion surveys indicate the United States population is divided on the subject of wilderness. In 1977, a study conducted by Opinion Research Corporation (ORC 1977) showed 7 percent of the population thought there was too much wilderness, 32 percent too little wilderness, and 46 percent thought the amount was just right. Those favoring more wilderness said it is needed for recreation, too much land is being lost to business or industry, and wildlife needs more space. Those favoring no additional wilderness felt the land could be better used for buildings, farming, and a growing population. In another survey by Opinion Research Corporation (ORC 1978), Americans rated wilderness fifth (after clean air, clean water, oil, and natural gas) as basic resources in short supply. In a 1979 survey conducted by Cambridge Reports, 39 percent of the U.S. population felt there was already enough wilderness, while 37 percent indicated the need for more wilderness (the remaining 23 percent did not express a preference). The results of these surveys vary because of the changing political and economic climate in the United States and because the questions were phrased differently in each survey. It appears that about 33 percent to 50 percent of the population feels there is currently enough wilderness areas while a similar proportion feels there is a shortage.

Social Well-being

Indicators of social well-being for the area show the positive and negative factors associated with living in a remote rural area. Negative factors include a higher number of people per physician, a higher proportion of housing without plumbing for exclusive use, and lower per capita income. The positive factors include lower divorce and crime rates and stability in the number of ranches. Information from local residents (see the Local Attitudes and Perceptions section) indicates they feel their area offers a high level of social well-being, and the positive aspects of their lifestyle far outweigh the negative.

ECONOMIC CONDITIONS

The Centennial Study Area is located in Beaverhead County, Montana and Clark and Fremont Counties, Idaho. Other counties which may be affected by management in the Centennial Study Area are Madison County, Idaho and Madison County, Montana. The primary industries in the area are tied to the development or use of natural resources and government. Principle activities in the area in and around the study area are timber harvest, mining, livestock grazing, and recreation. Population and per capita income for each county are shown in Table 3-7.

TABLE 3-7

POPULATION AND PER CAPITA INCOME IN COUNTIES NEAR THE CENTENNIAL STUDY AREA

State	County	Population 1980	Population per Sq. Mi.	Per Capita Income 1979
Montana	Beaverhead	8,186	0.6	$8,662
Montana	Madison	5,448	0.6	6,730
Idaho	Clark	798	0.5	9,972
Idaho	Fremont	10,813	5.8	5,750
Idaho	Madison	19,483	641.2	4,669

The Centennial Study Area is currently used for livestock grazing and recreation, primarily hunting. There is also a potential for mining and timber harvest in the study area. There are a total of 21 grazing allotments with 2,440 AUMs. Approximately 13 of the allotments are for sheep grazing on the Idaho portion. Grazing allotments also increase the value of a ranching operation for resale or for borrowing money. The question of whether all or part of the allotment is in wilderness does not appear to have a significant impact in this area of Montana and Idaho.

Commercial timber harvested in the study area could be sustained at 4.4 mmbf/yr. However, land use plan decisions recommend a 2.64 mmbf/yr timber harvest. Idaho timber is used primarily at mills in St. Anthony and Rexburg, Idaho while the Montana timber would most likely be used by a mill in Dillon, Montana. At 8.49 jobs per million board feet of timber harvest (USDA, FS 1983), a timber harvest of 2.64 mmbf/yr would support 22 jobs.

The primary known mineral deposit in the area is phosphate in the Taylor Mountain area. The pits from previous mining activity and the phosphate lease with above ground disturbance have been excluded from the study area. The J.R. Simplot Company is considering exchanging and rehabilitating these phosphate leases for holdings near their Soda Springs leases in Idaho.

Recreation in the study area is estimated at 5,846 visitor days per year. This use is primarily hunters in the fall. This amount of use supports nearly five jobs per year. Of these recreation days, 1,260 are related to nonmotorized recreation, 596 are related to motorized recreation and 3,990 could be either motorized or nonmotorized. Those categories which could involve either motorized or nonmotorized recreation are hunting, fishing, tent camping, and snowmobiling.

The number used in the economic analysis portions of the Environmental Consequences section come from an economic model which looks at actual dollars spent in a five-county area of Idaho and Montana. Income figures are in 1977 dollars.

WILDERNESS

Wilderness Diversity (Landform and Ecotype)

The Centennial Study Area is included in the Northern Rocky Mountains Landform Type 401 (Hammond 1964). There are 17 representatives of this landform type presently in the National Wilderness Preservation System totaling 6,962,644 acres. The Forest Service in its June 1978, Draft Environmental Statement, Roadless Area Review and Evaluation (RARE II) did not identify a need at either of two levels of landform representation for further examples of the Northern Rocky Mountains in the National Wilderness Preservation System.

The Centennial Study Area is included in the Rocky Mountain Forest Ecosystem (M3110) according to the Bailey-Kuchler System (Kuchler 1964 and USDA, FS 1976). This is a broad based classification system that does not evaluate site specific vegetative types. Three major ecosystems are found in the Centennial Study Area: Douglas-fir forest (011); Western Spruce, Fir Forest (014), and Alpine Meadows and Barren (045) (See Appendix F.)

The Forest Service in its 1979 RARE II study examined all wilderness and wilderness study areas in the United States for ecotype representation. They then assigned regional ecotype targets as a means of balancing ecotype diversity in the National Wilderness Preservation System. The highest target would have at least six wilderness areas of a specific ecotype. At the date of the RARE II study, there were seven existing wilderness and five Presidentially endorsed areas representing the Douglas-fir Forest ecosystem, sixteen existing wilderness and twelve Presidentially endorsed areas representing the Western Spruce, Fir Forest ecosystem, and fourteen existing wilderness and seven Presidentially endorsed areas representing the Alpine Meadows and Barren ecosystem.

In addition, the Forest Service RARE II study lists 209 potential Douglas-fir Forest representatives to the system, 298 Western Spruce, Fir Forest potential representatives, and 122 Alpine Meadows and Barren potential representatives.

Although adjacent to the Yellowstone Area, the Centennial Study Area does not add to the diversity of that ecosystem. The ecosystems which make up the Centennials are represented elsewhere in the Yellowstone Area.

Wilderness Opportunities: Proximity to Population Centers

The Centennial Study Area is within a five-hour drive (250 miles) of three industrial population concentrations defined as Standard Metropolitan Statistical Areas by the U.S. Bureau of Census. Billings has a 1980 population of 68,361 and a county-wide (Yellowstone County) population of 107,661. Great Falls has 56,568 people with a metropolitan area population of 80,639 (Cascade County). Boise, Idaho contains 102,125 inhabitants and a metropolitan population of 172,843 people (Ada County).

All Standard Metropolitan Statistical Areas are within a five-hour drive of abundant and diverse designated wilderness areas. There are five areas containing 2,007,269 acres within 250 miles of Billings and thirteen areas totaling 4,381,934 acres within 250 miles of Great Falls. Boise is within range of eight designated wilderness areas totaling 3,250,344 acres. (See Table 3-8.)

Statewide Wilderness Summaries

Appendix G describes the status of all designated wilderness and wilderness study areas, by agency, in the state of Montana. Appendix K describes the status of all designated wilderness and wilderness study areas, by agency, in the state of Idaho.

Regional Wilderness Analysis

Montana, Idaho, and Wyoming which intersect near the Centennial Study Area are combined into a region for purposes of this analysis. Visitors from this region have good road access to the Centennials, and the most heavily populated areas of all three states are within reasonable driving distance to visit the study area (250 miles or less). Residents of the states have similar economic and social backgrounds and presumably similar demands for wilderness resources.

In the region according to RARE II, there were 28 designated wilderness areas of 9,491,871 acres, 20 units totaling about 3,164,764 acres of administratively endorsed wilderness areas, and 129 wilderness study areas (2,523,054 acres). The further planning and administratively endorsed wilderness area figures are not current because the Forest Service is re-evaluating roadless areas in current forest plans. Many of those plans are either in final form or are soon to be released. Therefore the Forest Service wilderness study area figures are incomplete until all the final plans are published.

TABLE 3-8

PROXIMITY OF WILDERNESS TO POPULATION CENTERS

Status	Population Center	Total Wilderness Acres Within a 5-Hour Travel Time	State	BLM Number of Areas	BLM Acres	Other Agencies Number of Areas	Other Agencies Acres
Statutory Wilderness	Billings, MT	2,007,274	Montana	1	6,000	3	969,786
			Wyoming	—	—	2	1,037,483
	Great Falls, MT	4,387,934	Montana	1	6,000	12	3,292,917
			Idaho	—	—	1	1,089,017
	Boise, Id	3,250,344	Oregon	—	—	3	503,902
			Idaho	—	—	4	2,681,775
			Nevada	—	—	1	64,667

TABLE 3-9

REGIONAL WILDERNESS OPPORTUNITIES

	Designated Wilderness Areas			Presidentially Endorsed Areas			Further Study Planning Areas		
State	Agency	Number of Areas	Acres	Agency	Number of Areas	Acres	Agency	Number of Areas	Acres
Montana	FS	12	3,360,342	NPS	2	1,084,660	BLM	35	438,801
	FWS	3	64,997				NPS	1	7,645
	BLM	1	6,000	FWS	15	161,480			
	Total	16	3,431,339	Total	17	1,246,140	Total	36	446,446
Idaho	FS	5	3,825,069						
	NPS	1	42,243	NPS	1	69,880	BLM	58	1,534,116
	Total	6	3,867,312	Total	1	69,880	Total	58	1,534,116
Wyoming	FS	6	2,193,220						
	NPS	2	1,848,744	BLM	35	542,046	BLM	35	542,046
	Total	6	2,193,220	Total	2	1,848,744	Total	35	542,046

FS — Forest Service
BLM — Bureau of Land Management
FWS — Fish and Wildlife Service
NPS — National Park Service

Overall, the region has at least 15,179,243 acres in 177 areas either designated wilderness or with the potential of designation. Table 3-9 shows the distribution of designated wilderness areas in the region.

Several Factors Influencing the Regional Demand for Wilderness

Growth in population will have a major impact on the demand for wilderness. The Centennial Mountains are located in the fast growing northwest region, so increases in demand for all resources available on federal lands including wilderness recreation can be expected.

Growing amounts of leisure time should increase participation levels in wilderness recreation, particularly in such activities as sightseeing and camping. Based on information from the Office of Consumer Goods and Service Industries, Americans are increasingly enjoying their affluence in the form of more leisure. Individual workers received an average of 16 days vacation annually, the highest average in history.

The number of women seeking wilderness recreation is increasing. The number of women has more than doubled since 1970 in such activities as cross-country skiing, fishing, and hunting.

A factor that may decrease demand for wilderness recreation is the increasing age of the American population. The median age of America's population was 29.4 years in 1977, in 1990 it is projected to be 32.8, and by 2030 it is expected to reach 39.9. The influence of this trend is a decrease in demand for such wilderness recreation activities as backpacking and primitive camping. Older individuals tend to participate less in strenuous activities and to be more selective of their activities in general.

A factor which may decrease or increase demand for wilderness recreation is fluctuating energy costs. The mobility provided by automobiles has been a key factor in providing access to wilderness areas. Until 1978, recreation participation has been relatively insensitive to rising energy costs. During the period 1979 to 1980 increases in travel costs caused by rising energy prices significantly dampened participation in outdoor recreation.

Increasing personal incomes combined with increased leisure time referenced earlier may increase demand for wilderness recreation.

Changing tastes and preferences also increase demand for wilderness recreation. The environmental movement coupled with increased awareness of the importance of good physical fitness has increased demand for wilderness recreation.

Wilderness Quality Evaluation

This section examines the quality of the wilderness values found in the Centennial Study Area. Wilderness quality is evaluated by considering five items: size, apparent naturalness, the opportunities for solitude, the opportunities for primitive recreation, and the presence of special features such as outstanding scenic, ecological, geological, educational, or historic values. Although the Centennial Study Area includes lands managed by both the Forest Service and BLM, the wilderness qualities of both agency's lands in the area will be evaluated as a whole.

Size

The Centennial Study Area includes 92,815 acres. BLM administers 27,691 acres, the Beaverhead National Forest manages 4,474 acres, the Targhee National Forest administers approximately 42,040 acres. Also included in this study area are approximately 16,650 acres in two separate units managed by the Agricultural Research Service, 800 acres managed by the Fish and Wildlife Service, and approximately 1,160 acres administered by the State of Montana.

Not included in the study acreage are several areas excluded during the intensive inventory stage of wilderness review that are within the wilderness study boundaries. These modifications excluded areas of significant human influence on apparent naturalness.

In the vicinity of Taylor Mountains, 1,601 acres have been removed from the study due to open pit phosphate mining, haul roads, and a contiguous terracing project. A half mile to the southeast, another 224 acres have been excluded from the study due to numerous small mining pits and haul roads. On the eastern edge of the study area, two parcels of 64 acres and 300 acres have been removed from the study as they contain obvious contour furrowing and trenching.

In addition to the parcels of nonwilderness land, six cherry-stemmed access roads leading from the boundary of the study area up to the Continental Divide have also been excluded from the study. These cherry-stems include the East Fork of Dry Creek road which leads to the western block of the Sheep Station, the Taylor Creek phosphate mine shaft and road in the center of the study area, the Keg Springs road which leads to the eastern block of the Sheep Station, and the active Tin Cup slate mine and road. Also excluded are two cherry-stemmed roads on the west side, the East Fork of Bean Creek road associated with timber cutting in the Bear Creek drainage and a portion of the Price Peet road.

The southern boundary of the study area falls at midslope and is extremely difficult to locate on the ground as it does not follow either section lines or prominent topographic features as ridges, hills, or creeks. There are numerous crooks and elbows in the southern boundary line.

Naturalness

The Centennial Study Area, while not totally unaffected by human activity, does appear to be in a natural condition. North of the Continental Divide the Centennial Mountains are rough and rise sharply. This terrain has prevented most human activity. This portion is in a pristine, natural condition. The only signs of development activity are two small cherry-stemmed roads on the west side, a well camouflaged Soil Conservation Service snow course, and six short two-wheeled tracks, the longest of which is the remnants of one mile of the Odell, Spring Creek haul road. Table 3-10 gives the location and description of the impacts on the naturalness of the study area. The Existing Impacts on Wilderness Values Map shows the location and size of the development activities.

The study area south of the Continental Divide generally has a natural appearance even though several sites are affected by human activity. The rolling terrain and dense forests have drawn this activity.

Mining, grazing, and timber harvest have created nine vehicle ways, and four cherry-stemmed access roads which meet the BLM road definition. Also present are five spring or lake water developments, 670 acres of sagebrush spraying or reseeding projects, and the remains of two small-scale mining ventures, one associated with slate mining and the other with coal mining. The coal mine also has a dilapidated log cabin.

Solitude

The Centennial Study Area offers outstanding opportunities for solitude. It encompasses the 34-mile uplift of the Centennial Mountains and varies from two to eight miles in width. Forty-eight drainages dissect the study area and elevations vary from 7,000 to 10,000 feet. This results in a diverse topography and vegetation and assures the visitor of the opportunity to avoid encountering others in most of the study area.

The lower elevation foothills contain open forests of mature Douglas-fir, spruce, and lodgepole pine which provide vegetative screening without a sense of confinement. Higher elevations support a varied vegetative mosiac of open meadows, Douglas-fir, whitebark pine, and aspen in the wetter areas. Although rock faces and scree slopes restrict movement in the higher elevations the many drainages permit visitors to remove themselves from others visiting the area.

From some vantage points, especially south of the Continental Divide solitude may be adversely affected by off-site human activities. The center of the study area has been significantly altered by phosphate mining including exploration pits, tailing piles, and haul roads on the south side of Taylor Mountain. These remains may be viewed from a number of locations but especially from the south. About 364 acres of contour furrowing and trenching for watershed restoration occur on the eastern edge of the study area. There are areas of recent timber harvest on the northern, western, and southern edges. Visitors can observe human activity in the 16,650 acres of the Sheep Station or on the roads inside the Red Rock Lakes National Wildlife Refuge but the effect would be diminished by distance from these areas.

From certain vantage points a visitor may be affected by ongoing or past human activities. Generally however, the study area's vegetative and topographical screening, size, and expansive vistas from the study area impart a sense of isolation from the works and presence of human activity.

Primitive Recreation

The Centennial Study Area provides a diversity of opportunities for primitive and unconfined recreation. Its physical characteristics contribute to some outstanding opportunities for hiking, camping, and horseback riding. The open nature of its numerous drainages and a variety of old trails and vehicle ways allow for enjoyable nonmechanized travel. Views from on top of the ridges and mountains open out to the Teton Range 75 miles to the south and to the Lima Peaks, Gravelly, Snowcrest, and Madison Ranges to the north.

Hunting for elk, deer, moose, and black bear is a popular fall activity, and extensive wildflower displays attract visitors in spring. The Centennials offer good opportunities for wildlife observation and photography of such species as elk, bear, mule deer, moose, eagles, falcons, and hawks. The steep faces and ridges of the north aspect of the Centennial Mountains provide challenging climbs. Cross country skiing is a possible winter activity but is restricted on the north side of the Continental Divide due to difficult access, heavy snowpack, and avalanches. Fishing in the small lakes and streams is presently popular. West slope and Yellowstone cutthroat trout as well as rainbow, brown, and brook trout are found.

In summation, the Centennial Study Area offers diversity and high quality primitive recreation.

TABLE 3-10
MANMADE FEATURES WITHIN THE CENTENNIAL STUDY AREA

Feature	Legal Description	Location	Approximate Length	Remarks
Vehicle Way	T15S, R4W Sec. 4, 9	West Side	3/4 mi	two-wheel track used for fence maintenance
Vehicle Way	T15S, R4W Sec. 3, 10, 15	West Side	2-1/2 mi	two-wheel track, follows Peet Creek
Vehicle Way	T15S, R4W Sec. 2, 11	West Side	1-1/2 mi	two-wheel track extension off end of Price-Peet road
Vehicle Way	T14S, R1W Sec. 31	Center	1 mi	Odell/Spring Creek haul road constructed in 1950s for phosphate mining. Presently used by snowmobiles.
Vehicle Way	T15S, R3W Sec. 5	West Side	1/4 mi	two-wheel track constructed in 1960s for timber harvest
Vehicle Way	T14S, R3W Sec. 28, 33	West Side	1 mi	two-wheel track constructed early 1900s for wood hauling
Vehicle Way	T14N, R43E Sec. 19, 30	East Side	1 mi	two-wheel track logging access road from 1940s, follows Yale Creek
Vehicle Way	T14N, R42E Sec. 26	East Side	3/4 mi	two-wheel track across to old sheep camp. Follows fork of Hotel Creek
Vehicle Way	T14N, R42E Sec. 16, 21, 28, 33	East Side	2-1/4 mi	two-wheel track going up Blue Creek to Rheas Peak
Vehicle Way	T14N, R40E Sec. 14, 15, 22	South Side	1 mi	two-wheel track, unknown use
Vehicle Way	T14N, R40E Sec. 16, 22	South Side	3/4 mi	two-wheel track, unknown use
Vehicle Way	T14N, R40E Sec. 21	South Side	3/4 mi	two-wheel track, unknown use
Vehicle Way	T14N, R40E Sec. 20, 21	South Side	1/2 mi	two-wheel track, unknown use
Vehicle Way	T14N, R38E Sec. 11, 13, 14	Southwest Side	2 mi	two-wheel track built to access old coal mine. Has been "put to bed"
Vehicle Way	T14N, R38E Sec. 14, 15	Southwest Side	1/2 mi	two-wheel track spur of coal mine access way
SCS Snow Course	T14S, R2W Sec. 26, 27	Northern edge	N/A	established in 1948. Authorized motorized access to site
Spring Development	T15S, R4W Sec. 2	West Side	N/A	spring box and water tank
Spring Development	T14N, R38E Sec. 17	Southwest Side	N/A	7 metal water troughs, spring box
Spring Development	T14N, R42E Sec. 30	Southeast Side	N/A	1940s spring box and metal troughs
Lake Development	T14N, R39E Sec. 22	Southwest Side	N/A	early 1900s small dam on Aldous Lake. Washed out
Spring Development	T14N, R42E Sec. 20	Southeast Side	N/A	1940 spring box, piping, and metal troughs
Vegetative Treatment	T14N, R42E Sec. 19, 20	East Side	N/A	20-acre reseeding by airplane in 1956
Vegetative Treatment	T14N, R38E Sec. 14	West Side	N/A	350-acre reseeding in 1950
Vegetative Treatment	T14N, R38E Sec. 17, 18	West Side	N/A	300-acre sprayed for sagebrush in 1978
Mining Activity	T14N, R38E Sec. 11	Southwest Side	N/A	old coal mine, small tailings pile, and dilapidated log cabin
Mining Activity	T14N, R42E Sec. 6	South Side	N/A	slate mining claim. Several bulldozer cuts
Structure	T14N, R38E Sec. 11	Southwest Side	N/A	old log cabin, remains associated with old coal mine
Fences	Fencelines are scattered throughout portions of the area		18 mi	various types and degrees of disrepair

Supplemental Values

The Centennial Study Area contains a large variety of resources of scientific, educational, historic, geologic, and ecologic value.

In 1978, Congress called for the development of the Continental Divide National Scenic Trail. A portion of the Divide between Red Rock Pass to the east of Monida, Montana to the west has been jointly studied by the Forest Service and the Bureau of Land Management for inclusion in the National Continental Divide Trail System. In September 1979, a route was proposed that would traverse the length of the study area and the expected route is presently located.

Archaeological survey of contiguous lands on both sides of the Divide has identified many archaeological sites dating from the late archaic period to the historic Shoshone period. Indians used the Continental Divide for hunting and obtaining lithic material for tools and weapons.

Historic use of the area (1890-1915) included ranching with timber and mining as ancillary activities. The mountains have received use in the early 1900s from several tributary trails off the Monida to Red Rock Pass road; these trails have been used as wood hauling roads and pack trails (Earle 1980).

Cattlemen driving livestock into the valley on the day of the Nation's first centennial, July 4, 1876, named the Centennial Mountains.

Of geologic interest, the Centennials have a prominent fault scarp that is exposed along the north face of the range. In some places this scarp rises over 3,000 feet in one mile. Other cross faults divide the range into segments; the largest of these is near Odell Creek. Evidence of numerous avalanches and quakes can be seen.

The study area contains a large diversity of vegetative habitat types. Three hundred sixty-two taxa of vascular plants were identified during an inventory in 1979 (Lowry 1979). With a yearly precipitation of 30 inches in the mountains, there are beautiful wildflower displays every summer.

The Centennial Mountains provide habitat for elk, moose, and black bear. The study area offers cover and seclusion and the high country meadows are usually lush with forbs into the late fall. Although elk move out of the study area when the snow gets deep, some moose use it yearlong. During winter they often remain in the many sheltered basins along the Divide, browsing on the alpine fir. Black bear are commonly observed.

Several fur bearing species inhabit the study area. Beavers are active in several drainages. Martin and wolverine are occasionally sighted.

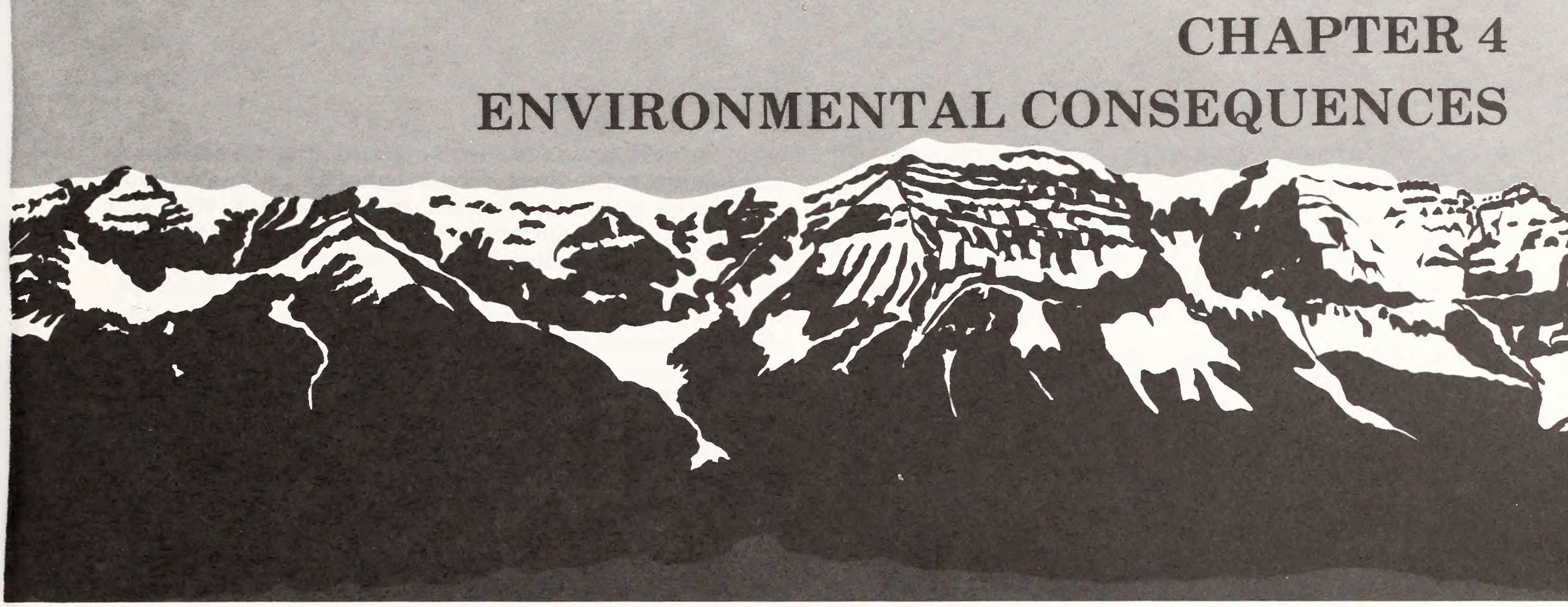
Two threatened and endangered species of wildlife use the study area. Grizzly bears have occasionally been sighted. Montana's only nesting peregrine falcons now inhabit the study area and may be expected to increase in numbers. Other raptor species including the bald eagle are commonly seen. The Targhee National Forest established a peregrine hack site in 1986 in the eastern end of the study area and birds are being reintroduced.

The study area is part of the watershed for the Red Rock Lakes Wilderness and National Wildlife Refuge, which contains one of the last remaining stream population of native grayling in Montana. The refuge also has both a breeding and wintering population of Trumpeter Swan.

The outstanding vistas offered from the high country constitute a significant visual resource. To the south, the Snake River Plateau extends uninterrupted for 150 miles. To the southeast 75 miles away, the Tetons, and most dramatically, the Grand Teton stand out on the horizon. Seventy-five miles to the west is the Lemhi Range. To the north, the horizon is full of peaks including mountains in the Gravellys, Snowcrests, and Madison Ranges of Montana.

In summary, the study area contains ecological, geological and other features of scientific, educational, scenic or historical value.

CHAPTER 4
ENVIRONMENTAL CONSEQUENCES



INTRODUCTION

This portion of the document is designed to disclose the effects of the proposed action and other alternatives on the resources of the Centennial Mountains Study Area. Whereas Chapter 2 describes how the entire study area will be managed given selection of a particular alternative, Chapter 4 attempts to disclose the degree of change from the area's existing state brought about by implementation of each alternative. The effects of wilderness and nonwilderness management on wilderness values and on local economics, although not included in the description of alternatives in Chapter 2, are examined as issues in Chapter 4.

ANALYSIS ASSUMPTIONS

The following assumptions were used by the interdisciplinary team in determining impacts.

The assumptions underlying the timber suitability for harvest and volume figures are contained in Appendix I, the Timber Production Potential in the Centennial Mountains.

Management of the study area will be according to the direction in existing plans if the area or portions of the area are not recommended for wilderness.

Recent actions and information have led to a change in the analysis of the phosphate leases. Phosphate leases in the study area represent a prior existing right. Owners of the phosphate leases are attempting to trade their interests in the Centennial leases for phosphate leases at other locations in Idaho. No further development of these leases is anticipated. Therefore impacts of development will not be analyzed in this document.

The zone of economic influence is considered to be Madison and Beaverhead counties in Montana and Fremont, Madison, and Clark counties in Idaho.

Designation would also protect native vegetation through restricting mechanical land treatments or reducing the introduction of nonnative plants. Restricting vehicle use would protect those cultural artifacts that could be removed by vehicle. Wilderness would ensure the maintenance of scenic values by requiring that all new projects blend into the natural landscape. Watersheds would be protected by the careful placement of water developments and surface disturbances. All types of wilderness compatible nonmotorized recreation including hiking, horseback riding, walk-in hunting, fishing, and sightseeing would be enhanced by wilderness designation.

Assuming fire is allowed to play its natural role if the study area is designated wilderness, wildfires would expand the forage base for game and livestock by opening up the canopy and permitting earlier successional stages to occur in the fire-altered areas. Allocation of this forage to livestock would be a management decision.

Restrictions on vehicle access resulting from wilderness designation would prevent loss of forage from soil compaction and soil loss due to erosion on low standard roads and would decrease the risk of livestock rustling.

The proposal to provide a snowmobile corridor in Odell Creek from December 1 through April 30 to complete the loop trail from West Yellowstone and Island Park is not without ramifications. Approximately one to one and one-half miles are on an old road that crosses and is controlled by private land. An easement, cooperative agreement or some other form of legalization will be necessary with the private landowner in order to allow the public to use this route legally. Also, concurrence of the Agricultural Research Service will be necessary to continue access across the Sheep Station. Avalanches have and will likely continue to occur in this area. Signing on both entrances to the corridor would inform users of the potential hazard. Environmental consequences are discussed under snowmobile use of the trail itself in each alternative.

The elk habitat on the timbered Montana slopes is important in the fall because the elk gather in the Centennials before migrating. Elk are more vulnerable to hunting harvest in a logged area. Therefore, logging would affect hunting, and particularly the excessive harvest of bulls. The Montana Department of Fish, Wildlife and Parks would likely implement more restrictive hunting regulations to mitigate any excessive harvest of bulls.

Potential impacts to elk from timber harvesting will be reduced with the application of the following mitigation measures. These measures were recommended by the Montana Cooperative Elk Logging study.

1. Sale boundaries may be changed to provide security cover.

2. Time of harvest may be limited to avoid interference with fall migrations.

3. Cutting method and sale size will be appropriate to minimize the impacts on elk habitat.

4. Road locations and standards may be changed to minimize the impact on elk habitat.

ALTERNATIVE 1: PROPOSED ACTION

Effects on Wilderness Values

Area Recommended

There are potential impacts anticipated from: snowmobile use, livestock grazing, timber harvesting and potential expansion of mining activities on the Tin Cup building stone claims. However, these impacts may not affect all of the values discussed. Where an impact occurs, it will be discussed.

Naturalness. A majority of the natural values will be maintained in the 28,688-acre area recommended for wilderness. There will be only three small areas where projected actions could result in adverse impacts to naturalness. Regarding livestock improvements, a minor impact may occur from building the half-mile of fence proposed in the Price-Peet allotment. Approximately one acre would be affected in this half-mile. This impact will be negligible as the fence will be constructed using wood or metal painted to blend with background features and located below ridgelines and in shaded areas. Fence construction will be accomplished using nonmotorized methods.

Snowmobile use is expected to occur only in Odell Creek Canyon from December through April and will take place on a fairly substantial base of snow. Naturalness for a quarter mile length will be affected by tracks in the snow. It is expected that approximately 1,600 visitor days will be distributed over the five-month season, resulting in what is considered a low density of use.

If the Tin Cup claim proved valid and expanded its operation into the recommended area (see Scenario in Chapter 2), 80 acres of natural values would be lost due to surface disturbance, waste piles and roads. An expansion of this operation is not expected. This prediction is based upon low industry demand, intermittent activity and professional knowledge of the operation.

A beneficial impact will result from precluding timber harvesting on 10,200 acres.

Solitude. Wilderness designation is expected to preserve existing levels of outstanding solitude. There are several areas where solitude values are presently being affected. Motorized vehicle use of the Sheep Station amounts to six vehicles per day on the cherry-stemmed Keg Springs Road and three vehicles per day on the cherry-stemmed East Dry Creek Road running through the Targhee National Forest to the Continental Divide. This level increases five-fold during the fall hunting season. Because of the high public interest in the recommended area and its pristine nature, the noise associated with both summer and fall motorized vehicle traffic contrasts with opportunities for solitude in areas adjacent to these access routes. Occasional maintenance of a spring development in Section 11, T. 15 S., R. 4 W., and periodic motorized vehicle use on the Price-Peet Road, Bean Creek Road and 2.5 miles of internal vehicle roads may occasionally disturb solitude. The frequency with which this may happen makes it a minor impact. Solitude on lands adjacent to the Sheep Station and the quarter-mile snowmobile corridor crossing designated BLM lands would continue to cause impacts at the current level of 1,600 visitor days. This snowmobile use is expected to occur over the five-month season. Solitude will be affected periodically throughout the use season. This level of impact is not expected to increase in the foreseeable future.

Opportunities For Primitive and Unconfined Recreation. Existing opportunities for hiking, horseback riding and other forms of primitive recreation will be preserved by designation. A single exception to this is the presence of the fence in the Price-Peet allotment which may inhibit freedom of travel, especially by horse. Because the expected level of use in the vicinity of the fence is expected to be low (less than 10 visitor days per year), the impact will be minor.

Special Features. Wilderness designation (precluding timber harvesting) would preserve many of the area's special features primarily the area's high scenic quality, and threatened and endangered wildlife habitat. Wilderness designation of the north face of the Centennials would enhance and complement the wilderness characteristics of the adjacent Red Rock Lakes National Wildlife refuge.

Area Not Recommended

There are potential impacts anticipated from: off-road vehicle use, snowmobile use, livestock grazing, timber harvesting and decorative stone mining.

Naturalness. In the 3,000-acre (three percent of the area) Price-Peet Creek area on the northwestern edge, naturalness would be lost for the foreseeable future because of logging. Because of the high quality timber in Price-Peet Creek, logging is very likely. The naturalness of the Price-Peet Creek drainage and adjacent recommended area would be strongly affected by timber harvest. Impacts would be minimized by small cutting units (30 acres or less), 600 feet spacing between cutting units, no more than 10 cutting units per entry and a 5 to 10 year interval between entries. Logging east of Matsingale Creek would not occur regardless of designation because of an administrative allocation (MFP decision) for management of this area as a roadless area.

The Tin Cup decorative building stone claim operates under an approved mining plan and will be in existence over the long term. Mining operations consisting of material removal, roads and waste piles will adversely affect wilderness values within the 160 acres of the claim. Naturalness would be lost on the 160 acres over the long term.

The proposed 275 AUM increase in livestock grazing on the Targhee (17 percent) will slightly affect the overall naturalness of the area. Improvments such as brush control, seeding and fencing would allow for the projected increases in AUMs while affecting naturalness on less than one percent of the area (900 acres).

Solitude. Solitude will be affected primarily by motorized vehicles accessing the Sheep Station through the Targhee in the spring, summer and fall and by snowmobile use on the Targhee, Continental Divide and Sheep Station during the winter. This is a continuation of the existing conditions with little or no increase in the level of activity. This level of use will continue on an estimated five percent (3,200 acres) of the area. New impacts from logging of the Price-Peet area, and mining of the Tin Cup claim (noise and presence of vehicles), will disturb solitude on approximately five percent of the area not recommended for wilderness. Livestock grazing will not affect solitude greatly because the small increase in AUMs is distributed over a large area (42,000 acres) and requires no additional on-the-ground livestock management.

Opportunities for Primitive and Unconfined Recreation. Primitive recreation will continue to be affected at current levels on the Sheep Station (which comprises approximately 18 percent of the area) by public motorized vehicle use during the summer and particularly during the hunting season. The quality of use of the Continental Divide trail would continue to be affected by motorized vehicles again at existing levels due to access to the Sheep Station. Timber harvest on 3,000 acres will decrease the quality of primitive recreation on five percent of the area. There would be little or no change on the Targhee as no change in management actions are projected.

Special Features. Timber harvest on 3,000 acres (approximately three percent of the area) would affect the scenic quality on the west end. No cultural sites are known to exist therefore no impact is expected. This limited amount of logging would have no significant affect on threatened and endangered species (grizzly bear), as animals only occasionally pass through the area and 97 percent of the security cover would remain unaffected.

Conclusion

On the area recommended for wilderness, natural values would remain affected primarily by the forces of nature except for one acre affected by construction of the half-mile of fence on the Price-Peet Allotment. Naturalness and solitude would benefit by precluding timber harvest on 10,200 acres. Although a designated snowmobile corridor would occur as part of the proposed action, no additional impact is expected as use levels are not expected to increase.

Precluding logging on 10,200 acres will preserve the area's high scenic quality and preserve security cover for grizzly bears that occasionally pass through the area.

In the area not recommended for wilderness naturalness, solitude and scenic quality would be adversely affected (diminished) on 3,000 acres as a result of timber harvest.

There would be minor impacts on naturalness from grazing activities such as brush clearing, seeding, fencing on less than one percent of the area. Mining operations will cause the loss of naturalness on 160 acres.

Effects on Recreation Use

Area Recommended

Snowmobile Use. An estimated 1,600 visitor days of snowmobile use will continue on the one-quarter mile Odell Creek trail within the area recommended for wilderness. Up to 1,100 visitor days of use in play areas in the area recommended for wilderness will be precluded. Those snowmobiles presently using the areas recommended for wilderness will be able to continue snowmobile use on nearby areas not recommended for wilderness. The overall impact will be low.

Hunting. Wilderness designation would maintain the existing quality of primitive recreation values associated with hunting on 28,688 acres (31 percent). Motorized hunting will not be affected as it currently does not exist.

Access for Motorized Vehicles. All wheeled vehicle use would be eliminated on 28,688 acres. Since access routes run through nonrecommended lands, accessibility will remain the same. Two existing primitive trails in Montana, each about one mile, would be permanently closed. One trail has already been closed through management planning decision. Closure of the other trail will displace 100 visitor days to other areas or change the type of use by these visitors. Present use is sightseeing, wood-gathering, exploring and camping. Table 4-1 shows expected changes in recreation. Access will continue to be provided to the Divide in Keg Springs and East Dry Creek from the Targhee side.

TABLE 4-1

CHANGES IN RECREATION USE LEVELS UNDER ALTERNATIVE 1 (PROPOSED ACTION)

Recreation Activity	Area Recommended for Wilderness Designation		Area Not Recommended for Wilderness Designation	
	Present Use (RVDs)	Projected Use (RVDs)*	Present Use (RVDs)	Projected Use (RVDs)*
Hunting	1,000	1,000	1,680	1,680
Snowmobiling	1,600	160[1]	1,600	1,600

RVD = Recreation Visitor Day

*Recreationists use both suitable and nonsuitable areas

[1] Play areas closed but snowmobile use allowed through Odell Creek corridor.

Area Not Recommended

Snowmobile Use. Snowmobile use on the south side of the divide (1,600 visitor days) would continue as it currently exists. Much of the area's snowmobile use is dependent upon passage through Odell Creek located in the area recommended for wilderness to complete the loop trail. Play areas are utilized along the way. There is no projected increase in use levels with permanent designation of the Odell Creek loop trail.

Hunting. Hunting use levels are not projected to change with this alternative and no new access is being developed. Wildlife populations are expected to remain stable.

Access for Motorized Vehicles. Access will continue to be provided in Keg Springs, and East Dry Creek from the Targhee side to the Continental Divide. Motorized vehicle use is expected to continue at current levels on the area not recommended during the summer and hunting season.

Conclusion

For the area recommended, snowmobile use would decrease from 1,100 to 1,000 recreation visitor days (RVDs). Hunting use levels will remain unchanged. Other motorized vehicle access will be eliminated displacing an expected 100 RVD per year.

For the area not recommended there will be no change in snowmobiling, hunting or other motorized recreational use levels.

Effects on Wildlife Habitat

Area Recommended

Fall Security Habitat for Elk. Preclusion of logging on 10,200 acres (12 percent) will protect elk fall and migrational habitat. Elk would be assured of fall hiding cover effectiveness on the 10,700 acres in the northwestern portion which presently serves as migrational, late fall, and early winter habitat for 300 to 500 elk. Cover effectiveness reduces hunting impact upon the bull elk population and provides both hiding cover and thermal cover. The balance of the area will remain unchanged. There are no projected management actions.

Habitat for Threatened and Endangered Species. Any grizzly bear that utilizes the area would benefit from maintaining existing cover and a remote, roadless environment on 28,688 acres (about 31 percent of the study area). Precluding logging will benefit the bear. Most adverse effects upon this species stem from incompatibility with human activities. The wilderness recommendation benefits the bear by reducing human-bear conflicts which are associated with development activities.

Aquatic Habitat Both Onsite and Offsite. A total of 28,688 acres of Centennial Valley watershed would remain undisturbed providing positive effects on fishery, offsite waterfowl (including trumpeter swan), and offsite bald eagle habitats. Erosion and sedimentation would not be accelerated by mining, logging, and road building, as they will not occur on the area recommended.

Areas Not Recommended

Fall Security Habitat for Elk. Approximately 3,000 acres of elk fall and migrational habitat in the Price Creek area are expected to be logged over several timber entry periods. Loss of cover due to timber harvest could bring about some short-term (25 to 30 years) displacement of elk in up to 15 percent of their fall and migrational habitat until cover is restored.

Threatened and Endangered Species. The presence of motorized vehicles on the Sheep Station would continue to discourage grizzly bears from these areas. There are two other projected management actions that would affect grizzly bear habitat. Logging 3,000 acres in Price-Peet area could cause loss of cover and increased human presence over a 25-30 year period. Mining activities on 160 acres in the southeast part of the area could cause periodic disturbance to bears crossing the area. The impacts are not considered to be significant as 97 percent of the area will continue to provide solitude and security cover for the bears that occasionally cross through the area. In addition, 25,300 acres of this area is covered by a Situation 2 designation protecting bear habitat (USDI, FWS 1986).

Aquatic Habitat Both Onsite and Offsite. West slope cutthroat trout habitat in the northwestern end would be adversely affected in the short term from increases in siltation caused by logging and road building on about 3,000 acres. The degree of siltation would depend on amount of road building, type of logging, whether the area was reseeded or not and amount of moisture, in the form of snow or rain, during the most erosive period. Revegetation of the area will reduce the time in which the soils are exposed to erosion factors. It is expected that trout populations will experience up to 50 percent short term reduction on about six miles of stream during the life of the project.

Conclusion

On the portion recommended for wilderness, precluding timber harvest will insure protection of 10,200 acres of elk fall and migrational habitat, (security and foraging). The 28,688 acres recommended for wilderness will continue to provide undisturbed habitat for the grizzly bear. There would be no change from natural levels of sedimentation now entering the Red Rocks refuge area.

On the portion not recommended for wilderness, 3,000 acres of elk fall and migrational habitat are identified as being available for future logging. Over the short term, logging would displace elk from 15 percent of the fall habitat area. The logging would adversely affect cutthroat trout habitat by increasing erosion and sediment production. The level of impact would depend on type and degree of disturbance caused by logging, road building, and revegetation. Populations could decrease in logged areas by 50 percent over the life of the logging project.

Effects on Grazing

Area Recommended

Wilderness designation on 28,688 acres (31 percent) would have little effect on livestock (cattle) grazing. Grazing management would be consistent with wilderness goals and objectives. The use of motorized vehicles would not be allowed except for maintenance of existing range facilities or emergency situations. Although wilderness would inconvenience grazing permittees, grazing use at existing levels would be allowed and is expected to continue.

Area Not Recommended

On the 64,127 acres (69 percent) not recommended for wilderness, livestock grazing would increase by 275 AUMs (17 percent), in accordance with the determined carrying capacity for the Targhee National Forest. Access to the Sheep Station from the south will be maintained and there will be no affect on grazing within the Sheep Station.

Conclusion

The present grazing levels will be maintained in the area recommended for wilderness. Although wilderness would inconvenience grazing permittees, it does not preclude grazing use. In the area not recommended grazing use levels are projected to increase by 275 AUMs (17 percent) through range management practices.

Effects on Timber Harvest

Area Recommended

Of the 28,688 acres recommended for wilderness, 10,200 acres have been identified for timber harvest. With the proposed action 99.3 mmbf of timber will be foregone for the long term on these 10,200 acres (see Suitable Timber Map). This is 77 percent of the 129 mmbf of timber designated as suitable for harvest in the entire study area as identified in existing land management plans.

Area Not Recommended

There would be no effect on the 3,000 acres of timber projected for harvest in the area not recommended wilderness. Table 4-2 shows the relative amounts of timber available and foregone in Alternative 1.

Conclusion

A total of 99.3 mmbf of timber (2.04 mmbf of annual yield) will be foregone on 10,200 acres. There would be no effect on the timber harvest on approximately 3,000 acres (29.2 mmbf).

TABLE 4-2

TIMBER RESOURCE IN ALTERNATIVE 1, THE PROPOSED ACTION

	Recommended Area	Nonrecommended Area
Suitable Timber	10,200 acres	3,000 acres
Standing Volume	99.3 mmbf	29.2 mmbf
Annual Yield	2.04 mmbf	0.6 mmbf
Volume Foregone	99.3 mmbf	0 mmbf

Effects on Oil and Gas Exploration and Development

Area Recommended

Although the potential for oil and gas is low to moderate, surface occupancy has been prohibited through stipulations on existing leases on the 28,688 acres recommended for wilderness. The proposed action would permanently preclude onsite development even if oil and gas were found. However, no development is currently projected.

Area Not Recommended

Mineral exploration and development on 64,127 acres would not be affected by the proposed action. There is no projected development. The potential for oil and gas is low to moderate.

Conclusion

Wilderness designation would continue the existing management restrictions which already preclude surface occupancy. There would be no impact from implementing the proposed action. On the portion not recommended wilderness, there would be no effect on development of oil and gas resources.

Effects on Economic Conditions

The impact to the local economies was evaluated using the Forest Service IMPLAN Model (USDA, FS 1983). Employment and income changes are projected for the year 1995. Table 4-3 lists the impacts of Alternative 1 relative to the projections for the No Action Alternative.

Conclusion

Loss of timber harvest in the area recommended for wilderness could reduce local area employment by 17 jobs and annual income by $402,084.

TABLE 4-3

ECONOMIC IMPACTS OF ALTERNATIVE 1 (PROPOSED ACTION)

	Projected Annual Employment 1995[1]		Projected Annual Income 1995	
Economic Resources	Alternative 1	No Action Alternative	Alternative 1	No Action Alternative
Timber Harvest	5	22	$118,260	$520,344
Recreation				
Snowmobiling	22	22	248,640	248,640
Elk Hunting	3	3	28,944	26,784
Livestock	5	5	120,083	123,020
Total	35	52	$515,927	$918,788

[1] Units in person years. Employment potential; no guarantee that this level of employment will occur. Estimates are for year 1995 and is not cumulative.

Unavoidable Adverse Impacts

The impacts to the wilderness resource under the proposed action would be 3,000 acres subject to logging in the Price Creek drainage. Naturalness, solitude, opportunities for primitive and unconfined recreation and scenic quality will be adversely affected. Time of year and method of logging could have an affect on the overall impacts to the area. Logging will cause accelerated erosion into Lima Reservoir and cause the loss of up to 50 percent of the fish population for 5 to 10 years in the affected streams below the logged areas. Siltation in Lima Reservoir will increase from logging.

There are soil types and slopes in the area to be logged that are particularly susceptible to erosion. Road building and maintenance will be the biggest contributors in accelerating the loss of soil during and after logging.

Sedimentation will decrease the water quality in streams in the area as well as in Lima Reservoir. This could cause up to 50 percent loss of fisheries in six miles of stream for 5 to 10 years.

Relationship Between Short-Term Use and Long-Term Productivity

There are no major activities with the proposed action that would affect the long-term productivity of the lands. Logging activities could adversely affect fisheries habitat and cause downstream siltation, but their productivity will return as logged areas revegetate.

Irreversible and Irretrievable Commitment of Resources

The only irreversible and irretrievable commitment of resources is the removal of building stone materials from the Tin Cup mining claim.

ALTERNATIVE 2: ALL WILDERNESS

Effects on Wilderness Values

Area Recommended

There are potential impacts anticipated from livestock grazing and potential expansion of mining activities on the Tin Cup building stone claim.

Naturalness. Impacts associated with this recommendation would be the half mile of fence in the Price-Peet allotment. Approximately one acre would be affected in this half mile. This impact will be negligible as the fence will be constructed using wood or metal painted to blend with background colors and located off ridgelines or in shadowed areas. Fence construction will be done using nonmotorized methods.

The Tin Cup decorative building stone claim operates under an approved mining plan and will be in existence over the long term. Mining operations such as material removal would adversely affect natural values on the 160 acres of the claim. Material is removed infrequently by truck. If the Tin Cup mine proved valid and did eventually expand its operation into the recommended area (see Scenario in Chapter 2), approximately 80 acres of natural values would be lost due to surface disturbance, waste piles and roads. An expansion of this operation is highly unlikely.

Blair Lake and the Sheep Station would return to their natural settings with the elimination of off road vehicle use. This is estimated to be 6 off road vehicles per day increasing to 30 vehicles per day during hunting season (approximately 2,000 vehicle use days per year affecting an estimated 3,000 acres).

Solitude. Solitude will be enhanced on approximately 3,000 acres (five percent) due to the restriction of motorized vehicles inside the Sheep Station. This is estimated at six vehicles per day on Keg Springs Road and three vehicles per day on East Dry Creek, increasing five fold during hunting season (approximately 975 vehicle use days per year). Vehicles could continue their use up to the boundary of the wilderness area but could no longer enter.

Opportunities for Primitive and Unconfined Recreation. Wilderness designation would maintain and enhance the high quality primitive recreation on 92,815 acres. Inclusion of the 16,650-acre Sheep Station would enhance opportunities associated with hiking, backpacking, cross-country skiing, climbing, horseback riding, photography, nature study, hunting and fishing along the Continental Divide trail which traverses this area. Big game hunting, specifically elk hunting, would benefit from maintenance of wildlife habitat and elimination of off road vehicle problems. The presence of the half mile of fence in the Price-Peet allotment may inhibit freedom of travel by horses. However, because the level of use in the vicinity of the fence is expected to be low (less than 10 visitor days/year), its impact on primitive and unconfined recreation should be minor.

Special Features. The study area's special features such as cultural values, threatened and endangered habitat and scenery, would not be subjected to any adverse impacts.

Conclusion

This alternative will preserve the wilderness characteristics of the entire area with the possible exception of 240 acres containing mining operations where natural values could be lost. Solitude will be enhanced by management control of off road vehicles within the Sheep Station eliminating up to 975 vehicle use days per year. Access is through the Targhee via Keg Springs and East Dry Creek Roads.

Primitive recreation and special features will be enhanced by inclusion of the Sheep Station. It will allow better management and control of factors, such as indiscriminate off road vehicle use, especially on the Continental Divide trail that traverses the area.

Effects on Recreation Use

Area Recommended

Snowmobile Use. Possibly the greatest impact that wilderness designation would have would be on snowmobiling. Folks visiting West Yellowstone and Island Park count on using the play areas, riding down Odell Creek to Lakeview for an overnight stay then returning to their origin. Several areas accessed from the south serve as play areas. Some are adjacent to the Divide on the south and some are on top of or straddle the Divide. These would no longer be available for use. However, the most important aspect of snowmobiling in the Centennials; the corridor through Odell Creek Canyon for the loop trail from Island Park, Idaho or West Yellowstone, Montana and back; would be closed under this alternative.

Closure of the entire study area to snowmobiles would result in a loss of 1,600 recreation visitor days of snowmobile use. About 6,350 acres of suitable snowmobile terrain would be closed.

Hunting. Big game hunting, specifically elk hunting, would benefit from maintenance of wildlife habitat and elimination of off road vehicle harassment on about 3,000 acres of the Sheep Station. Precluding timber harvest in 13,200 acres would provide long-term protection of elk fall and migrational habitat. Elk would be assured of fall hiding cover effectiveness on about 10,200 acres in the northwestern portion, which presently serves as security cover for 300 to 500 elk. Cover effectiveness reduces hunting impact upon the bull elk population and provides both hiding cover and thermal cover. The balance of the area will remain unchanged. There are no projected management actions.

Access for Motorized Vehicles. The greatest impact to motorized vehicles will be the restrictions on the 16,650-acre Sheep Station, which is accessed through the Targhee. The National Forest lands are already closed to all motorized vehicles except on two designated cherry-stemmed roads. On BLM lands, 22,511 acres contain year-round vehicle restrictions to protect recreation, watershed and wildlife habitat values. About 3,860 acres on BLM lands in the northwestern portion, which are presently open to vehicles on existing roads during the summer and fall, would be closed year round. About seven miles of existing primitive vehicle trails now subject to various vehicle restrictions would be permanently closed. Table 4-4 shows the expected changes in recreation. This is expected to displace 100 visitor days during the summer and during hunting season.

TABLE 4-4

CHANGES IN RECREATION USE LEVELS UNDER ALTERNATIVE 2, ALL WILDERNESS

	Area Recommended for Wilderness Designation	
Recreation Activity	Present Use (RVDs)	Projected Use (RVDs)
Hunting	2,680	2,580
Snowmobiling	1,600	0

RVD = Recreation Visitor Day

Conclusion

There would be no long-term increase in recreation use due to wilderness designation. Snowmobile use would be prohibited except on the cherry-stemmed roads essentially eliminating 1,600 visitor days of snowmobile use. Motorized vehicle hunting would be replaced by primitive forms of hunting. Big game hunting, particularly the primitive forms would improve due to control of off road vehicles, primarily on the Sheep Station.

About 3,860 acres of public land and 16,650 acres of the Sheep Station not already closed to wheeled vehicles would be permanently closed except for designated Agricultural Research Station uses. Seven miles of existing primitive trails with partial vehicle use restrictions would be permanently closed to wheeled vehicles displacing 100 recreation visitor days.

Effects on Wildlife Habitat

Area Recommended

Fall Security Habitat For Elk. Precluding logging activities would assure fall hiding cover effectiveness on about 13,200 acres in the western portion, which presently serves as migrational, late fall, and early winter habitat for 300 to 500 elk. Cover effectiveness reduces hunting impact upon the bull elk population and provides both hiding cover and thermal cover.

Habitat For Threatened and Endangered Species. Precluding logging on 13,200 acres and closing the Sheep Station and remainder of the study area to motorized vehicles would benefit grizzly bear by providing a remote, roadless environment. The 92,815 acres recommended for wilderness include 25,300 acres of Situation 2 grizzly bear habitat. The wilderness recommendation benefits the bear by reducing human-bear conflicts which are associated with development activities.

Aquatic Habitat Both Onsite and Offsite. There would be positive effects on fishery, offsite waterfowl (including trumpeter swan), and offsite bald eagle habitat if the 50,775 acres of watershed north of the Divide is designated wilderness. Prohibition of erosion causing activities such as logging and road building would eliminate the potential for sedimentation from these sources.

Conclusion

A total of 92,815 acres of wildlife habitat would remain undisturbed by development activity. Key species such as elk, cutthroat trout, threatened and endangered species, and species of special interest would benefit. Wilderness recommendation for 50,775 acres of watershed for the Centennial Valley would benefit fish and wildlife.

Effects on Grazing

Area Recommended

Wilderness designation would have no impact on livestock (cattle) grazing to the north of the Continental Divide since the Dillon MFP (USDI, BLM 1979b) already precludes any grazing increases. Existing grazing would continue at present levels. The Beaverhead National Forest does not manage for livestock on its 4,474 acres and would not be a factor.

The only livestock improvement to be constructed is the half-mile of fence in the Price-Peet allotment. It will be built without using motorized vehicles.

Designation of the Sheep Station as part of the wilderness area will preclude motorized vehicle use for grazing management except where specifically permitted through the wilderness management planning process. This will complicate some activities while merely concentrating others.

Wilderness designation would have a greater impact on grazing south of the Divide. The *Land Management Plan for the Targhee National Forest* (USDA, FS 1985b) has identified a potential increase of 275 AUMs on allotments by the year 2030 based on forage yields. Structural and nonstructural range improvements such as brush removal, fencing, seeding, changing seasons of use or redistribution of livestock would be necessary to support this increase in AUMs. Under wilderness designation, new range improvements would not be permitted merely to accommodate increased numbers of livestock. Therefore this increase in livestock grazing would be foregone.

On Targhee National Forest lands, livestock permittees may have higher costs for allotment management since motorized vehicle and equipment use will likely be restricted inside wilderness boundaries. Maintenance of existing improvements, facilities, and trails will generally require hand tools and equipment. Communications with herders may be more difficult. Salt for livestock would generally be brought in on pack animals. Some routine allotment and livestock inspection may require more time due to horse or foot travel.

Conclusion

The opportunity to increase livestock grazing by 275 AUMs over present use on the Targhee would be foregone by wilderness designation. Depending on degree of dependency on motorized vehicles, livestock permittees would experience increased time or increased costs in construction and maintenance of range improvements and monitoring, especially on the Targhee. A policy of allowing wildfires to burn in wilderness areas would increase forage and allow greater livestock management flexibility.

Effects on Timber Harvest

Area Recommended

Alternative 2 would eliminate all timber harvest within the study area. A total of 2.64 mmbf annual yield is foregone if the entire study area is designated wilderness. (See Table 4-5.)

Conclusion

A total of 2.64 mmbf of annual yield and most habitat management options would be foregone on 13,200 acres north of the Divide.

TABLE 4-5

TIMBER RESOURCE IN ALTERNATIVE 2, ALL WILDERNESS

	Recommended Area
Suitable Timber	13,200 acres
Standing Volume	128.5 mmbf
Annual Yield	2.64 mmbf
Volume Foregone	128.5 mmbf

Effects on Oil and Gas Exploration and Development

Area Recommended

There are presently 12,785 acres leased for oil and gas but there is no exploration activity and none is expected. As these leases expire, they would not be reissued. At that point all further exploration and development would be precluded. This is not considered to be a significant impact as occurrence potential is rated as low for much of the area. Where occurrence potential is moderate the area is virtually inaccessible for oil and gas development.

Conclusion

There is no potential for development, therefore there will be no impact.

Effects on Economic Conditions

The impact to the local economies was evaluated using the Forest Service IMPLAN Model (USDA, FS 1983). Employment and income changes are projected for the year 1995. Table 4-6 lists the impacts of Alternative 2 relative to projections for the No Action Alternative.

Conclusion

Loss of timber harvest in the area recommended for wilderness could reduce local area employment by 22 jobs and annual income by $520,344. There would also be a reduction in employment by 22 jobs and income by $248,640 from reduction in snowmobiling use levels. There would be a minor reduction in potential jobs and income in the livestock industry.

ALTERNATIVE 3: NO WILDERNESS (No Action)

Effects on Wilderness Values

Area Not Recommended

There are potential impacts from livestock grazing, off road vehicle use, timber harvesting and potential expansion of the Tin Cup mining claim and oil and gas exploration on the BLM lands. The Beaverhead and Targhee National forests would have virtually no adverse impacts to natural values due to their management practices.

Naturalness. Motorized vehicle use of the Keg Springs road amounts to six vehicles per day and three vehicles per day use East Dry Creek road. Much of this traffic is destined for various points on the Sheep Station. Blair Lake receives a good portion of this use for fishing. This traffic presently increases five-fold during hunting season with the most use occurring on the Sheep Station. Cross-country vehicle trails are evident wherever the terrain permits off road vehicle travel. Naturalness of an estimated 3,000 acres of the Sheep Station will continue to be affected by this use. No additional impacts are projected to increase with this alternative. Total vehicle use days are estimated at 1,600-1,800 and are not expected to increase in the foreseeable future. Natural values would be disturbed or eliminated by projected timber harvest (cutting, roads, slash) on 13,200 acres. A half-mile of fence (approximately one acre) will be constructed in the Price-Peet allotment in accordance with designs that will not significantly affect natural values.

Solitude. The presence of motorized vehicles (see frequency above) for recreation on approximately 3,000 acres of the Sheep Station will continue to disrupt solitude. However, the use level is not expected to increase in the foreseeable future. Timber harvesting will create an impact on solitude. Solitude will be affected by use of chain saws, bulldozers, trucks, as well as removal of vegetation. Approximately 600 acres would be harvested per year. About 14 percent or 13,200 acres is expected to be affected over a 25 year period.

TABLE 4-6
ECONOMIC IMPACTS OF ALTERNATIVE 2, ALL WILDERNESS

Economic Resources	Projected Annual Employment 1995[1]		Projected Annual Income 1995	
	Alternative 2	No Action Alternative	Alternative 2	No Action Alternative
Timber Harvest	0	22	0	$520,344
Recreation				
Snowmobiling	0	22	0	248,640
Elk Hunting	3	3	28,944	26,784
Livestock	4	5	106,628	123,020
Total	7	52	$135,572	$918,788

[1] Units in person years. Employment potential; no guarantee that this level of employment will occur. Estimates are for year 1995 and is not cumulative.

Opportunities for Primitive and Unconfined Recreation. Primitive recreation will be replaced and disrupted by motorized vehicles on the areas projected for logging. Logged and other disturbed areas do not generally attract horseback riding, cross-country skiing, hiking, or backpacking. Therefore, these areas would probably be seldom used for primitive recreation. Much of the Continental Divide Trail would continue to be traversed by motorized vehicles due to the availability of access to the Sheep Station through the Targhee.

The half-mile of fence in Price-Peet Creek may inhibit travel by horse but, since horse use is so low the impact will be minor. This wilderness value is expected to be affected on less than one acre.

Special Features. Features in the study area such as cultural values, threatened and endangered species habitat and scenery would be disturbed, damaged or lost due primarily to easy access on approximately 3,000 acres of the Sheep Station by motorized vehicles and harvest of timber on 13,200 acres. Surface disturbance from logging will reduce elk cover and grizzly bear habitat. Bears would be unlikely to occupy disturbed areas and reduced cover would displace elk. Logging will increase siltation into streams draining into Red Rock Lakes and could reduce trout populations for the short term (5-10 years) by 50 to 100 percent on approximately 6 miles of stream. There are no known cultural sites, there will be cultural clearances prior to logging activities and identified sites would be protected.

Conclusion

Off road vehicle use in and around the Sheep Station would continue to affect solitude and natural values, and the quality of primitive recreation opportunities on 3,000 acres. Logging activities will eliminate natural values and reduce solitude on 13,200 acres. In addition, surface disturbance from logging will reduce elk cover and grizzly bear habitat. Bears would be unlikely to occupy the disturbed areas and elk would be displaced. Logging will increase siltation into streams draining into Red Rock Lakes and reduce trout populations by 50 to 100 percent on approximately six miles of stream.

Effects on Recreation Use

Snowmobile Use. This alternative would have no adverse affect on snowmobiling. The 1,600 visitor days will likely continue due to the popularity of the area and the loop trail through Odell Creek. Snowmobiling on the south side of the Divide and along the Divide will continue at the existing levels. Study area wide, approximately 6,350 acres of terrain suitable for snowmobiling would be open to snowmobiles.

Hunting. Hunting opportunities and quality would decline due to increasing pressure from off-road vehicles associated with logging activities. There would also be a reduction of security cover due to logging on the 13,200 acres west of Matsingale Creek. Consequently, over the short term (10 years) hunting visitor days are expected to decrease from 2,680 to 2,480 annually.

Access for Motorized Vehicles. Access to the Sheep Station through the Targhee National Forest would not change. Motorized vehicle use (see levels in Alternative 1) on the Sheep Station would continue at existing levels due to lack of controls and enforcement.

Access will be developed for logging west of Matsingale Creek. These roads would likely be closed after the logging activity, but would provide short term (10 years) access for firewood gathering, hunting, and other activities. Table 4-7 shows the expected changes in recreation.

TABLE 4-7

CHANGES IN RECREATION USE LEVELS UNDER ALTERNATIVE 3, NO ACTION

	Area Not Recommended for Wilderness	
Recreation Activity	Present Use (RVDs)	Alternative 3
Hunting	2,680	2,480
Snowmobiling	1,600	1,600

RVD = Recreation Visitor Day

Conclusion

Snowmobiling at the current level of 1600 visitor days is expected to continue at existing levels on 6,350 acres.

Hunting opportunities will decrease slightly, from 2680 to 2480 visitor use days annually from impacts associated with logging.

Access for motorized vehicles will be unrestricted on the 16,650 acres of ARS and will continue at existing levels. The area west of Matsingale Creek that is opened up by logging and will provide short term (10 years) access for firewood gathering, hunting, and other activities.

Effects on Wildlife Habitat

Fall Security Habitat for Elk. The primary impact of this alternative on elk would be the potential loss of cover effectiveness as a result of logging on 13,200 acres of fall and migrational habitat. The resulting decrease in elk population may require restrictions in hunting until the cover regenerated (approximately 25 years). Over the long term, fall cover effectiveness would be reduced due to road construction.

Habitat for Threatened and Endangered Species. Grizzly bear would be adversely affected on 13,200 acres by road building for logging which would increase human-related conflicts and decrease hiding cover and isolation. The bear would no longer be likely to occupy disturbed areas. However, 25,300 acres are covered by a Situation 2 designation protecting bear habitat (USDI, FWS 1986).

Aquatic Habitat both Onsite and Offsite. Fisheries and offsite waterfowl habitats would be affected by logging and road building on 13,200 acres. Fish mortality would be most significant due to short-term impacts of accelerated erosion and sedimentation from logging and road building (Bjornn et al 1977). These impacts would be short-term (10 years or less) and would retard recovery of cutthroat and grayling populations on about twenty-six miles of onsite stream. Approximately 18,974 acres of Red Rock Lakes watershed where no development activities are projected could be maintained for wildlife values in the long term even if the study area were not designated wilderness.

Conclusion

The nonwilderness alternative would result in adverse impacts on elk and species of special interest. Logging would degrade 13,200 acres of fall and migrational habitat. Grizzly bear habitat will be adversely affected on 13,200 acres. Offsite and onsite fish and waterfowl habitat would be adversely affected by accelerated erosion and siltation following logging on about 13,200 acres of watershed. Up to fifty percent reductions in trout populations could be expected over the short term (5 to 10 years) on about twenty-six miles of stream.

Effects on Grazing

Selection of the No Wilderness Alternative would cause no impact on the range resource. Multiple use management would continue as prescribed in the *Dillon Resource Area Management Framework Plan* (USDA, BLM 1979) and in the land management plans for the Beaverhead (USDA, FS 1986b) and Targhee National Forest (USDA, FS 1985b).

On the Targhee National Forest lands, an increase of 275 AUMs may be authorized by the year 2030. Structural and nonstructural range improvements would allow this increase in AUMs.

Conclusion

A total of 275 additional AUMs over present use would be available for grazing, and range improvement projects would be allowed.

Effects on Timber Harvest

There would be no effect on timber harvest. Timber harvest in the northwest corner could occur on 13,200 acres. The total volume is 128.5 mmbf with an annual yield of 2.64 mmbf.

Conclusion

A total of 2.64 mmbf of annual yield would be available for harvest on 13,200 acres north of the Divide.

Effects on Oil and Gas Exploration and Development

Potential development of mineral resources could occur as outlined in the land management plans. There is no expected development potential.

Effects on Economic Conditions

The impact to the local economies was evaluated using the Forest Service IMPLAN Model (USDA, FS 1983). Employment and income changes are projected for the year 1995. Table 4-8 lists the impacts for the No Action Alternative.

Conclusion

There would be no impact on jobs or income related to any of the economic resources.

TABLE 4-8

ECONOMIC IMPACTS OF ALTERNATIVE 3, NO WILDERNESS

Economic Resources	Projected Annual Employment 1995[1] No Action Alternative	Projected Annual Income 1995 No Action Alternative
Timber Harvest	22	$520,344
Recreation		
Snowmobiling	22	248,640
Elk Hunting	3	26,784
Livestock	5	123,020
Total	52	$918,788

[1] Units in person years. Employment potential; no guarantee that this level of employment will occur. Estimates are for year 1995 and is not cumulative.

ALTERNATIVE 4

Effects on Wilderness Values

Area Recommended

There are potential impacts anticipated from: off road vehicle use, snowmobile use, and potential expansion of mining activities on the Tin Cup building stone claims.

Naturalness. A majority of the natural values will be maintained in the area recommended for wilderness. In the event that the building stone mining operations expanded its claims into Montana, naturalness would be lost on the 80-acre claim due to material removal and roads. Present use of the mine, which is low and sporadic, indicates that the probability of expansion is very low.

Solitude. Wilderness designation would preserve existing levels of outstanding solitude. Off road vehicle activity (see frequency in Alternative 1) on the adjacent Sheep Station which is accessed through the Targhee National Forest would continue at the existing levels during the summer and fall hunting season. This would continue to adversely affect solitude in areas adjacent to the roads and vehicle ways. People visiting the area during hunting season with the idea of having a wilderness experience would especially be affected.

Opportunities for Primitive and Unconfined Recreation. Existing opportunities for primitive and unconfined recreation will be preserved. These opportunities are fairly limited by the steepness of the terrain except in Hell-Roaring Canyon where hunting, horseback riding and backpacking opportunities are outstanding.

Special Features. The escarpment providing outstanding scenery from the Centennial Valley would be preserved.

Area Not Recommended

There are impacts from: off road vehicle use, snowmobile use, grazing activities, and timber harvesting.

Naturalness. Motorized vehicle use of the Keg Springs road amounts to six vehicles per day and three vehicles per day on East Dry Creek road. Much of this traffic is destined for various points on the Sheep Station. Blair Lake receives a good portion of this use for fishing. This traffic presently increases five-fold during hunting season with the most use occurring on the Sheep Station. Pioneer roads are evident wherever the terrain is conducive to off road vehicle travel. Naturalness of an estimated 3,000 acres of the Sheep Station will continue to be affected by this use. No additional impacts are projected to increase with this alternative. Total vehicle use days are estimated at 1,600-1,800 and are not expected to increase in the foreseeable future. Natural values may be disturbed or eliminated by timber harvest (cutting, roads, slash) on 13,200 acres. A half mile of fence (approximately one acre) will be constructed in the Price-Peet allotment according to designs that will not impact the overall appearance of the area.

Solitude. The presence of motorized vehicles (see frequency above) for recreation on approximately 3,000 acres of the Sheep Station will continue to disrupt solitude. However, the use level is not expected to increase in the foreseeable future. On the 13,200 acres open for timber harvesting solitude will be affected by use of chain saws, bulldozers, tracks, etc. on a seasonal basis. Timber harvesting and road building will also adversely affect opportunities for solitude by removing vegetative screening.

Opportunities for Primitive and Unconfined Recreation. Primitive recreation will be replaced and disrupted by motorized vehicles on the areas projected for logging. Logged and other disturbed areas do not generally attract horseback riding, cross-country skiing, hiking, or backpacking. Therefore, these areas would probably be lightly used for primitive forms of recreation. Much of the Continental Divide Trail would continue to be traversed by motorized vehicles due to the availability of access to the Sheep Station through the Targhee.

The half-mile of fence in Price-Peet Creek may inhibit travel by horse but, since the use is so low the impact will be minor.

Special Features. Features on the study area such as cultural values, threatened and endangered species habitat, and scenery would be disturbed, damaged or lost due primarily to easy access on approximately 3,000 acres of the Sheep Station by motorized vehicles and development of timber on 13,200 acres. Surface disturbance from logging will reduce elk cover and grizzly bear habitat. Bears would be unlikely to occupy disturbed areas and reduced cover would displace elk. Logging will increase siltation into streams draining into Lima Reservoir and could reduce fish populations for the short term (5-10 years) by up to 50 percent on about six miles of stream. There are no known cultural sites, there will be cultural clearances prior to logging activities and identified sites would be protected.

Conclusion

Off road vehicle use in and around the Sheep Station would continue to affect solitude and natural values, and the quality of primitive recreation opportunities on 3,000 acres.

Logging activities will eliminate natural values and reduce solitude on 13,200 acres. In addition, surface disturbance from logging will reduce elk cover and grizzly bear habitat. Bears would be unlikely to occupy the disturbed areas and elk would be displaced. Logging will increase siltation into streams draining into Lima Reservoir and reducing fish populations by up to 50 percent on about six miles of stream.

Effects on Recreation Use

Area Recommended

Snowmobile Use. There is negligible, if any, snowmobile use occurring on this area other than the corridor through Odell Creek, affecting one-quarter mile of recommended area, therefore, there would be no affect.

Hunting. Wilderness designation would have little or no affect on hunting as all present hunting is nonmotorized.

Access for Motorized Vehicles. There are no vehicles on this part of the area so there would be no impact.

Area Not Recommended

Snowmobile Use. There would be no change in the pattern of use as the corridor through Odell Creek has been recommended to allow continued use of the Odell Creek trail for snowmobiling. Snowmobiling use of the Targhee National Forest and west end of the study area would continue as it currently exists. Approximately 1,600 visitor days of snowmobiling use occurs here.

Hunting. Hunting quality and opportunities would decrease to 1,980 recreation visitor days from 2,180 because of logging activities and displacement of elk.

Access For Motorized Vehicles. Roads on the west end created by logging would create new short term access but would be closed upon completion of logging activities. Table 4-9 lists the changes in recreation use for Alternative 7.

TABLE 4-9

CHANGES IN RECREATION USE LEVELS UNDER ALTERNATIVE 4

	Area Recommended for Wilderness Designation		Area Not Recommended for Wildernes Designation	
Recreation Activity	Present Use (RVDs)	Projected Use (RVDs)	Present Use (RVDs)	Projected Use (RVDs)
Hunting	500	500	2,180	1,980
Snowmobiling	0	0	1,600	1,600

RVD = Recreation Visitor Day

Conclusion

For the area recommended, hunting use levels will remain unchanged. Snowmobiling is essentially nonexistent except for the Odell Creek corridor affecting one-quarter mile of recommended area.

For the area not recommended, snowmobile use will remain unchanged. Hunting recreation use days will decline by 200 from 2,680 to 2,480 as a result of logging activities.

Effects on Wildlife Habitat

Area Recommended

Fall Security Habitat for Elk. There would be no change from the current situation for fall security habitat for elk.

Habitat for Threatened and Endangered Species. There would be no expected change on grizzly bear habitat.

Aquatic Habitat both Onsite and Offsite. There would be no expected change on onsite or offsite aquatic habitat.

Area Not Recommended

Fall Security Habitat for Elk. The primary impact of this alternative on elk would be the potential loss of cover effectiveness on 13,200 acres of fall and migrational habitat. The resulting decrease in elk population may require restrictions in hunting until the cover regenerated (approximately 25 years). Over the long term, fall cover effectiveness would be reduced due to road construction.

Habitat for Threatened and Endangered Species. Grizzly bear would be adversely affected on 13,200 acres by road building for logging which would increase human-related conflicts and decrease hiding cover and isolation. The bear would no longer be likely to occupy disturbed areas. However, 9,817 acres designated as Situation 2 grizzly bear habitat would be protected (USDI, FWS 1986).

Aquatic Habitat both Onsite and Offsite. Fisheries and offsite waterfowl habitats would be affected by logging and road building on 13,200 acres. Fish mortality would be most significant due to short-term impacts of accelerated erosion and sedimentation from logging and road building (Bjornn et al 1977).

These impacts would be short-term (10 years or less) and would retard recovery of cutthroat and grayling populations on about six miles of onsite stream. Approximately 18,974 acres of Red Rock Lakes watershed where no development activities are projected could be maintained for wildlife values in the long term even if the study area were not designated wilderness.

Conclusion

This alternative would result in adverse impacts on elk and species of special interest. Logging would degrade 13,200 acres of fall and migrational habitat. Grizzly bear habitat would be adversely affected on 13,200 acres. Offsite and onsite fish and waterfowl habitat would be adversely affected by accelerated erosion and siltation following logging on about 13,200 acres of watershed. Up to fifty percent reductions in fish populations could be expected over the short term (5 to 10 years) on about six miles of stream.

Effects on Grazing

Area Recommended

There is no grazing occurring in this area.

Area Not Recommended

The number of AUMs assigned for livestock grazing may increase by 275 over present use, essentially all on the Targhee National Forest.

Conclusion

There would be no adverse affect on the area recommended. Livestock grazing may increase by 275 AUMs over present use in the area not designated wilderness.

Effects on Timber Harvest

Area Recommended

In the portion recommended wilderness, no suitable timber has been projected to be cut. There would be no impact.

Area Not Recommended

A total of 128.5 mmbf of timber would be available for harvest on 13,200 acres of suitable timber north of the Divide if 27,859 acres are designated wilderness. Table 4-10 shows the relative amounts of timber available in Alternative 4.

Conclusion

There would be no impact. A total of 2.64 mmbf of annual yield timber would be available for harvest on 13,200 acres north of the Divide.

TABLE 4-10

TIMBER RESOURCE IN ALTERNATIVE 4

	Recommended Area	Nonrecommended Area
Suitable Timber	0 acres	13,200 acres
Standing Volume	0 mmbf	128.5 mmbf
Annual Yield	0 mmbf	2.64 mmbf
Volume Foregone	0 mmbf	0 mmbf

Effects on Oil and Gas Exploration and Development

Area Recommended

There are presently 1,166 acres leased for oil and gas but there is no exploration activity and none is expected. As leases expire, they would not be reissued. At that point all further exploration and development would be precluded. This is not considered to be a significant impact as occurrence potential is rated as low for much of the area. Where occurrence potential is moderate, the area is virtually inaccessible for oil and gas development.

Area Not Recommended

There would be no effect on the oil and gas exploration and development on the nonwilderness portion of the area.

Conclusion

No development is expected. There is no impact.

Effects on Economic Conditions

The impact to the local economies was evaluated using the Forest Service IMPLAN Model (USDA, FS 1983). Employment and income changes are projected for the year 1995. Table 4-11 lists the impacts of Alternative 4 relative to the projections for the No Action Alternative.

Conclusion

There would be no significant impact on jobs or income related to any of the economic resources.

ALTERNATIVE 5

Effects on Wilderness Values

Area Recommended

There are potential impacts anticipated from offroad vehicles, livestock grazing and timber harvesting.

Naturalness. A majority of the natural values will be maintained in the area recommended for wilderness. There will be only one area where a projected action could result in adverse impacts to naturalness. A minor impact may occur from building the half-mile of fence proposed in the Price-Peet allotment. Approximately one acre would be affected in this half-mile. This impact will be negligible as the fence will be constructed using wood or metal painted to blend with background features and located below ridgelines and in shaded areas. Fence construction will be accomplished using nonmotorized methods.

Solitude. Wilderness designation would preserve existing levels of outstanding solitude. There are no activities planned south of the Divide so there would be no impact. Precluding logging in the Peet Creek area will enhance solitude by the absence of chain saws, trucks, cats, etc.

Opportunities For Primitive and Unconfined Recreation. Existing opportunities for hiking, horseback riding and other forms of primitive recreation will be preserved by designation. A single exception to this is the presence of the fence in the Price-Peet allotment which may inhibit freedom of travel, especially by horse. Because the expected level of use in the vicinity of the fence is expected to be low (less than 10 visitor days/year), the impact will be minor.

Special Features. Wilderness designation (precluding timber harvesting) would preserve many of the area's special features such as cultural values, and threatened and endangered wildlife habitat.

Area Not Recommended

Naturalness. The Tin Cup decorative building stone claim operates under an approved mining plan and will be in existence over the long term. Mining operations (material removal, roads, waste piles) will adversely affect natural values within the 160 acres of the claim. Impacts are expected to be minor because of infrequent activity on this claim.

The proposed 275 AUM (17 percent) increase of livestock grazing on the Targhee would not affect the overall naturalness of the area. There are no known improvements or structures proposed and the increase is disturbed over a large area.

Solitude. Solitude will be affected primarily by motorized vehicles on the Sheep Station which is accessed through the Targhee National Forest in the spring, summer and fall and by snowmobile use on the Targhee, Continental Divide and Sheep Station during the winter. This is a continuation of the existing conditions. This level of use, which is estimated at six vehicles per day on the cherry-stemmed Keg Springs Road and three vehicles per

TABLE 4-11

ECONOMIC IMPACTS OF ALTERNATIVE 4

Economic Resources	Projected Annual Employment 1995[1]		Projected Annual Income 1995	
	Alternative 4	No Action Alternative	Alternative 4	No Action Alternative
Timber Harvest	22	22	$520,344	$520,344
Recreation				
Snowmobiling	22	22	248,640	248,640
Elk Hunting	3	3	28,944	26,784
Livestock	5	5	119,520	123,020
Total	52	52	$917,448	$918,788

[1] Units in person years. Employment potential; no guarantee that this level of employment will occur. Estimates are for year 1995 and is not cumulative.

day on the cherry-stemmed East Fork Dry Creek Road, will continue on an estimated five percent (3,200 acres) of the area. This use level increases five fold during the fall hunting season. New impacts, logging of the Price-Peet area and mining of the Tin Cup claim (noise and presence of vehicles), will disturb solitude on approximately five percent of the area not recommended for wilderness.

Opportunities for Primitive and Unconfined Recreation. Primitive recreation experiences will continue to be affected on the Sheep Station (which comprises approximately 18 percent of the study area) due to motorized vehicle use during the summer and particularly during the hunting season. The quality of use of the Continental Divide trail would continue to be affected by motorized vehicles due to access to the Sheep Station. There would be little or no change or difference on the Targhee as no actions are projected.

Special Features. Management prescription would preserve many of the area's special features such as cultural values and threatened and endangered wildlife habitat.

Conclusion

On the area recommended for wilderness, natural values would remain affected primarily by the forces of nature except for one acre affected by construction of the half-mile of fence on the Price-Peet Allotment. Naturalness and solitude would benefit by precluding timber harvest on 13,200 acres.

In the area not recommended for wilderness, naturalness, solitude and scenic quality would be adversely affected (diminished) on 3,000 acres as a result of motorized vehicle use primarily by the public on the Sheep Station. On the Tin Cup mining claim naturalness will be diminished somewhat by the minor amount of mineral extraction occurring.

Effects on Recreation Use

Area Recommended

Snowmobile Use. There is little or no snowmobile use now in the area recommended for wilderness so the impact would be very low.

Hunting. Wilderness designation would maintain the existing quality of primitive recreation values associated with hunting on 29,904 acres (32 percent). Motorized hunting will be minimally affected as it currently exists only on about two miles of cherry-stemmed road continuing from the Price-Peet road.

Access for Motorized Vehicles. All motorized vehicle use would be eliminated on 29,904 acres. Two miles of existing primitive trail in Montana, which is presently closed seasonally or year-round would be permanently closed. This will displace 100 visitor days to other areas or change the type of use by these visitors. Present use is sightseeing, hunting, woodgathering, exploring and camping. Table 4-12 shows expected changes in recreation.

Area Not Recommended

Snowmobile Use. There would be no adverse impact on snowmobile use. Snowmobiles would continue using the same areas in the same manner and degree. Play areas on the Targhee and on top of the Divide would remain open. Odell Creek would continue as the loop trail connection allowing for the estimated 1,600 visitor days of snowmobile use.

Hunting. Hunting use levels are not projected to change with this alternative. No new access is being developed. Wildlife populations are expected to remain stable.

Access for Motorized Vehicles. Access will be provided in Keg Springs and East Dry Creek from the Targhee side to the Continental Divide. Motorized vehicle use is expected to continue at current levels during the summer and hunting season.

Conclusion

For the area recommended, snowmobile use would not be affected. Hunting use levels will remain about the same. Other motorized vehicle access will be eliminated displacing an expected 100 recreation use days.

For the area not recommended, there will be no change in snowmobiling, hunting or other motorized recreational use levels.

Effects on Wildlife Habitat

Area Recommended

Fall Security Habitat for Elk. Precluding logging on 13,200 acres will protect elk fall and migrational habitat. Elk would be assured of fall hiding cover effectiveness on the 13,200 acres in the northwestern portion, which presently serves as migrational, late fall, and early winter habitat for 300 to 500 elk. Cover effectiveness reduces hunting impact upon the bull elk population and provides both hiding cover and thermal cover. The balance of the area will remain unchanged. There are no projected management actions.

TABLE 4-12

CHANGES IN RECREATION USE LEVELS UNDER ALTERNATIVE 5

	Area Recommended for Wilderness Designation		Area Not Recommended for Wildernes Designation	
Recreation Activity	Present Use (RVDs)	Projected Use (RVDs)	Present Use (RVDs)	Projected Use (RVDs)
Hunting	1,000	1,000	1,680	1,680
Snowmobiling	0	0	1600	1,600

Habitat for Threatened and Endangered Species. Grizzly bear would benefit from maintaining existing cover and a remote, roadless environment on 29,904 acres. Precluding logging will benefit the bear. Most adverse effects upon this species stem from its incompatibility with human activities. The wilderness recommendation benefits the bear by reducing human-bear conflicts which are associated with development activities.

Aquatic Habitat Both Onsite and Offsite. A total of 20,349 acres of Centennial Valley watershed would remain undisturbed providing positive effects on fishery, offsite waterfowl (including trumpeter swan), and offsite bald eagle habitats. Erosion and sedimentation would not be accelerated by mining, logging, and road building, as they will not occur on the area recommended.

Area Not Recommended

Fall Security Habitat for Elk. There would be no change from the present situation, therefore no impact.

Threatened and Endangered Species. The presence of motorized vehicles on the Sheep Station would disturb bears that occasionally use these areas. There is one projected management action that could impact grizzly bear habitat. Mining activities on 160 acres in the southeast part of the area could cause periodic disturbance to bears crossing the area. The impacts are not considered to be significant as 96 percent of the area will still provide solitude and security cover.

Conclusion

On the portion recommended for wilderness, precluding timber harvest will insure protection of 13,200 acres of elk fall and migrational habitat, (security and foraging). The 29,904 acres recommended for wilderness will continue to provide undisturbed habitat for the grizzly bear. There would be no change from natural levels of sedimentation now entering the Red Rocks refuge area. On the area not recommended, bears would be disturbed from using the Sheep Station by the presence of man. Mining activities on the 160 acre Tin Cup claim could cause periodic disturbance to bears crossing the area.

Effects on Grazing

Area Recommended

Wilderness designation on 29,904 acres would have little effect on livestock (cattle) grazing. Grazing management would be consistent with wilderness goals and objectives. The use of motorized vehicles would not be allowed except for maintenance of existing range facilities or emergency situations. Although some inconvenience would be experienced by grazing permittees, grazing use at existing levels would be allowed.

A half-mile long fence proposed in this area could be constructed in accordance with the wilderness management policy.

Area Not Recommended

On the 62,911 acres not recommended for wilderness, livestock grazing would increase by 275 AUMs. In accordance with the determined carrying capacity for the Targhee National Forest grazing use on the forest will increase by 17 percent. Access to the Sheep Station from the south will be maintained.

Conclusion

The present grazing levels will be maintained in the area recommended for wilderness. Although wilderness would inconvenience grazing permittees, it does not preclude grazing use. In the area not recommended grazing use levels are projected to increase by 275 AUMs (17 percent) through range management practices.

Effects on Timber Harvest

Area Recommended

In the 29,904 acres recommended for wilderness, 128.5 mmbf of timber will be foregone for the long term on 13,200 acres of suitable timber north of the Divide. This is 100 percent of the 128.5 mmbf of timber designated as suitable for harvest in the study area as identified in existing land management plans.

Area Not Recommended

There would be no effect on timber harvest on the portion not recommended for wilderness. Table 4-13 shows the relative amounts of timber available and foregone in Alternative 1.

Conclusion

A total of 128.5 mmbf of timber (2.64 mmbf of annual yield) will be foregone on 13,200 acres. There would be no effect on the timber harvest in those portions not recommended wilderness.

TABLE 4-13
TIMBER RESOURCE IN ALTERNATIVE 5

	Recommended Area	Nonrecommended Area
Suitable Timber	13,200 acres	0 acres
Standing Volume	128.5 mmbf	0 mmbf
Annual Yield	2.64 mmbf	0 mmbf
Volume Foregone	128.5 mmbf	0 mmbf

Effects on Oil and Gas Exploration and Development

Area Recommended

Although the potential for oil and gas is low to moderate, surface occupancy has been prohibited through stipulations on existing leases on the 29,904 acres recommended for wilderness. This will preclude onsite development of the area even if oil and gas were found, but no development is currently projected.

Area Not Recommended

Mineral exploration and development on the 69,911 acres not recommended would be governed by existing land management plans. There is no projected development. The potential for oil and gas is low to moderate.

Conclusion

On the portion recommended for wilderness, existing management restrictions already preclude surface occupancy. Wilderness designation would continue this management. On the portion not recommended wilderness, there would be no effect on development of oil and gas resources. However, no development is expected.

Effects on Economic Conditions

The impact to the local economics was evaluated using the Forest Service IMPLAN Model (USDA, FS 1983). Employment and income changes are projected for the year 1995. Table 4-14 lists the impacts of Alternative 5 relative to the projections for the No Action Alternative.

Conclusion

Loss of timber harvest in the area recommended for wilderness could reduce local area employment by 22 jobs and annual income by $520,344. There would also be a minor reduction in employment and income from reductions in snowmobiling use levels.

Conclusion

The restrictions on logging will result in 22 potential jobs not being realized. However, 30 jobs in ranching and recreation would be sustained. All economic activity would sustain $397,784 in annual income to the local economy.

ALTERNATIVE 6

Effects on Wilderness Values

Area Recommended

There are potential impacts from snowmobile use, livestock grazing, and potential expansion of mining activities on the Tin Cup building stone claims.

Naturalness. A majority of the natural values will be maintained in the area recommended for wilderness. There will be only one area where a projected action could result in adverse impacts to naturalness. A minor impact may occur from building the half-mile of fence proposed in the Price-Peet allotment. Approximately one acre would be affected in this half-mile. This impact will be negligible as the fence will be constructed using wood or metal painted to blend with background features and located below ridgelines and in shaded areas. Fence construction will be accomplished using nonmotorized methods.

Snowmobile use is expected to occur only in Odell Creek Canyon from December through April and will take place on a fairly substantial base of snow. Naturalness for a quarter mile length will be affected only by tracks in the snow. Approximately 1,600 visitor days will be distributed over the five-month season.

A beneficial impact will result from precluding timber harvesting on 10,200 acres.

If the Tin Cup claim proved valid and expanded its operation into the recommended area (see Scenario in Chapter 2), 80 acres of natural values would be lost due to surface disturbance, waste piles and roads. An expansion of this operation is not expected. This prediction is based upon low industry demand, intermittent activity and professional knowledge of the operation.

Solitude. Wilderness designation would preserve existing levels of outstanding solitude. There are several areas where solitude values are being affected. Motorized vehicle

TABLE 4-14
ECONOMIC IMPACTS OF ALTERNATIVE 5

	Projected Annual Employment 1995[1]		Projected Annual Income 1995	
Economic Resources	Alternative 5	No Wilderness Alternative	Alternative 5	No Wilderness Alternative
Timber Harvest	0	22	$0	$520,344
Recreation				
Snowmobiling	22	22	248,640	248,640
Elk Hunting	3	3	28,944	26,784
Livestock	5	5	120,200	123,020
Total	30	52	$397,784	$918,788

[1] Units in person years. Employment potential; no guarantee that this level of employment will occur. Estimates are for year 1995 and is not cumulative.

use of the Sheep Station amounts to six vehicles per day on the cherry-stemmed Keg Springs Road and three vehicles per day on the cherry-stemmed East Dry Creek Road. This level increases five-fold during the fall hunting season. Because of the high public interest in the recommended area and its pristine nature, the noise associated with both summer and fall motorized vehicle traffic contrasts with opportunities for solitude in areas adjacent to these access routes. Occasional maintenance of a spring development in Section 11, T15S, R4W and periodic motorized vehicle use on the Price-Peet Road, Bean Creek Road and 2.5 miles of internal vehicle roads may occasionally disturb solitude. The frequency with which this may happen makes it a minor impact. Solitude on lands adjacent to the Sheep Station and the quarter-mile snowmobile corridor crossing designated BLM lands would deteriorate in proportion to the level of use. For example, an estimated 100 snowmobile use days if used simultaneously would have an adverse affect on solitude for a relatively short time. If this is spread out over the use season, solitude will be affected for a longer period of time. This level of impact is not expected to increase in the foreseeable future.

Opportunities for Primitive and Unconfined Recreation. Existing opportunities for hiking, horseback riding and other forms of primitive recreation will be preserved by designation. A single exception to this is the presence of the fence in the Price-Peet allotment which may inhibit freedom of travel, especially by horse. Because the expected level of use in the vicinity of the fence is expected to be low (less than 10 visitor days per year), the impact will be minor.

Special Features. Wilderness designation (precluding timber harvesting) would preserve many of the area's special features such as cultural values, and threatened and endangered wildlife habitat. Wilderness designation of the north face of the Centennials would enhance the wilderness characteristics of the adjacent Red Rock Lakes National Wildlife refuge.

Area Not Recommended

Naturalness. The proposed 275 AUM (17 percent) increase of livestock grazing on the Targhee would not affect the overall naturalness of the area. There are no known improvements or structures proposed and the increase is distributed over a large area.

Solitude. Solitude will be affected primarily by motorized vehicles accessing the Sheep Station through the Targhee in the spring, summer and fall and by snowmobile use on the Targhee along the Continental Divide and Sheep Station during the winter. This is a continuation of the existing conditions. This level of use will continue on an estimated five percent (3,200 acres) of the area.

Opportunities for Primitive and Unconfined Recreation. Primitive recreation will continue to be affected on the Sheep Station (which comprises approximately 18 percent of the area) by motorized vehicle use during the summer and particularly during the hunting season. The quality of use of the Continental Divide trail would continue to be affected by motorized vehicles due to access to Sheep Station. There would be little or no change or difference on the Targhee as no change in management actions are projected.

Special Features. Features on the study area such as cultural values, threatened and endangered species habitat, and scenery would be disturbed, damaged or lost due primarily to easy access to approximately 3,000 acres of the Sheep Station by motorized vehicles.

Conclusion

On the area recommended for wilderness, natural values would remain affected primarily by the forces of nature except for one acre affected by construction of the half mile of fence on the Price-Peet Allotment. Naturalness and solitude would benefit by precluding timber harvest on 10,200 acres. Although a designated snowmobile corridor would occur as part of the proposed action, no impact is expected as use levels are not expected to increase.

Off road vehicle travel in and around the Sheep Station lands would continue to affect solitude and natural values, and the quality of primitive recreation opportunities on 3,000 acres.

Effects on Recreation Use

Area Recommended

Snowmobile Use. There would be no impact as snowmobile use is not expected to change. The Odell Creek corridor is projected to remain open.

Hunting. Hunting use levels are not projected to change with this alternative. No new access is being developed. Wildlife populations are expected to remain stable. The existing quality of primitive recreation values associated with hunting on 58,363 acres would be maintained.

Access for Motorized Vehicles. All wheeled vehicle use would be eliminated on 58,363 acres. Two miles of existing primitive trail in Montana which is now closed seasonally would change the type of use or displace about 100 visitor days to other areas (See Table 4-15).

Access will continue to be provided in Keg Springs, and East Dry Creek from the Targhee side to the Continental Divide.

TABLE 4-15
CHANGES IN RECREATION USE LEVELS UNDER ALTERNATIVE 6

Recreation Activity	Area Recommended for Wilderness Designation: Present Use (RVDs)	Area Recommended for Wilderness Designation: Projected Use (RVDs)*	Area Not Recommended for Wildernes Designation: Present Use (RVDs)	Area Not Recommended for Wildernes Designation: Projected Use (RVDs)
Hunting	1,000	900	1,680	1,680
Snowmobiling	1,100	1,100	1,600	1,600

RVD = Recreation Visitor Day
*Recreationists use both suitable and nonsuitable areas

Area Not Recommended

Snowmobile Use. Much of the area's snowmobile use is dependent upon passage through Odell Creek to complete the loop trail. Play areas are utilized along the way. There is no projected increase in use levels on the Odell Creek loop trail.

Hunting. Hunting use levels are not projected to change with this alternative and no new access is being developed. Wildlife populations are expected to remain stable.

Access for Motorized Vehicles. Access will continue to be provided in Keg Springs, and East Dry Creek from the Targhee side to the Continental Divide. Motorized vehicle use is expected to continue at current levels on the area not recommended during the summer and hunting season.

Conclusion

For the area recommended, snowmobile use would remain the same. Hunting use levels will remain unchanged. Other motorized vehicle access will be eliminated displacing an expected 100 RVD.

For the area not recommended there will be no change in snowmobiling, hunting or other motorized recreational use levels.

Effects on Wildlife Habitat

Area Recommended

Fall Security Habitat for Elk. Precluding logging on 13,200 acres will protect elk fall and migrational habitat. Elk would be assured of fall hiding cover effectiveness on the 13,200 acres in the northwestern portion, which presently serves as migrational, late fall, and early winter habitats for 300 to 500 elk. Cover effectiveness reduces hunting impact upon the bull elk population and provides both hiding cover and thermal cover. The balance of the area will remain unchanged. There are no projected management actions.

Habitat for Threatened and Endangered Species. Grizzly bear would benefit from maintaining existing cover and a remote, roadless environment on 58,363 acres. Precluding logging will benefit the bear. Most adverse effects upon this species stem from its incompatibility with human activities. The wilderness recommendation benefits the bear by reducing human-bear conflicts which are associated with development activities.

Aquatic Habitat Both Onsite and Offsite. A total of 33,325 acres of Centennial Valley watershed would remain undisturbed providing positive effects on fishery, offsite waterfowl (including trumpeter swan), and offsite bald eagle habitats. Erosion and sedimentation would not be accelerated by mining, logging, and road building, as they will not occur on the area recommended.

Area Not Recommended

There would be no change from the present situation, therefore no impacts.

Habitat for Threatened and Endangered Species. The presence of motorized vehicles on the Sheep Station would disturb bears that occasionally use these areas. However, the Situation 2 designation on 9,817 acres would protect bear habitat on a fourth of the land not designated.

Conclusion

On the portion recommended for wilderness, precluding timber harvest will insure protection of 13,200 acres of elk fall and migrational habitat, (security and foraging). The 58,363 acres recommended for wilderness will continue to provide undisturbed habitat for the grizzly bear. There would be no change from natural levels of sedimentation now entering the Red Rocks refuge area.

On the area not recommended, bears would be affected by motorized vehicles on the Sheep Station.

Effects on Grazing

Area Recommended

Wilderness designation on 58,363 acres would have little effect on livestock (cattle) grazing. Grazing management would be consistent with wilderness goals and objectives. The use of motorized vehicles would not be allowed except for maintenance of existing range facilities or emergency situations. Although of some inconvenience to grazing permittees, grazing use at existing levels would be allowed.

A half-mile long fence proposed in this area could be constructed in accordance with the wilderness management policy.

Area Not Recommended

On the 34,452 acres not recommended for wilderness, livestock grazing would increase by 275 AUMs. In accordance with the determined carrying capacity for the Targhee National Forest, grazing use on the forest will be increased by 275 AUMs (17 percent). Access to the Sheep Station from the south will be maintained.

Conclusion

The present grazing levels will be maintained in the area recommended for wilderness. Although wilderness would inconvenience grazing permittees, it does not preclude grazing use. In the area not recommended grazing use levels are projected to increase by 275 AUMs (17 percent) through range management practices.

Effects on Timber Harvest

Area Recommended

In the 58,363 acres recommended for wilderness, 128.5 mmbf of timber will be foregone for the long term on 13,200 acres of suitable timber north of the Divide. This is 100 percent of the 128.5 mmbf of timber designated as suitable for harvest in the study area as identified in existing land management plans.

Area Not Recommended

There would be no effect on the portion not recommended wilderness. Table 4-16 shows the relative amounts of timber available and foregone in Alternative 6.

TABLE 4-16

TIMBER RESOURCE IN ALTERNATIVE 6

	Recommended Area	Nonrecommended Area
Suitable Timber	13,200 acres	0 acres
Standing Volume	128.5 mmbf	0 mmbf
Annual Yield	2.64 mmbf	0 mmbf
Volume Foregone	128.5 mmbf	0 mmbf

Conclusion

A total of 128.5 mmbf of timber (2.64 mmbf of annual yield) will be foregone on 13,200 acres. There would be no effect on the timber harvest in those portions not recommended wilderness.

Effects on Oil and Gas Exploration and Development

Area Recommended

Although the potential for oil and gas is low to moderate surface occupancy has been prohibited through stipulations on existing leases on the 58,363 acres recommended for wilderness. This will preclude onsite development of the area even if oil and gas were found, but no development is currently projected.

Area Not Recommended

Mineral exploration and development on the 34,452 acres not recommended would be governed by existing land management plans. There is no projected development. The potential for oil and gas is low to moderate.

Conclusion

Existing management restrictions already preclude surface occupancy. Wilderness designation would continue this management.

On the portion not recommended wilderness, there would be no effect on development of oil and gas resources, but no development is expected.

Effects on Economic Conditions

The impact to the local economies was evaluated using the Forest Service IMPLAN Model (USDA, FS 1983). Employment and income changes are projected for the year 1995. Table 4-17 lists the impacts of Alternative 1 relative to the projections for the No Action Alternative.

Conclusion

Loss of timber harvest in the area recommended for wilderness could reduce local area employment by 22 jobs and annual income by $520,344.

TABLE 4-17

ECONOMIC IMPACTS OF ALTERNATIVE 6

	Projected Annual Employment 1995[1]		Projected Annual Income 1995	
Economic Resources	Alternative 6	No Wilderness Alternative	Alternative 6	No Wilderness Alternative
Timber Harvest	0	22	$0	$520,344
Recreation				
Snowmobiling	22	22	248,640	248,640
Elk Hunting	3	3	28,944	26,784
Livestock	5	5	110,998	123,020
Total	30	52	$388,582	$918,788

[1] Units in person years. Employment potential; no guarantee that this level of employment will occur. Estimates are for year 1995 and is not cumulative.

ALTERNATIVE 7

Effects on Wilderness Values

Area Recommended

There are potential impacts anticipated from: off road vehicle use, snowmobile use, and potential expansion of mining activities on the Tin Cup building stone claims.

Naturalness. A majority of the natural values will be maintained in the area recommended for wilderness. In the event that the building stone mining operations expanded its claims into Montana, naturalness would be lost on the 80-acre claim due to material removal and roads. Present use of the mine, which is low and sporadic, indicates that the probability of expansion is very low.

Solitude. Wilderness designation would preserve existing levels of outstanding solitude. Off road vehicle activity on the adjacent Sheep Station (see frequency in Alternative 1) would continue at the existing levels during the summer and fall hunting season. This would continue to adversely affect solitude in areas adjacent to the roads and vehicle ways. People visiting the area during hunting season with the idea of having a wilderness experience would especially be affected.

Opportunities for Primitive and Unconfined Recreation. Existing opportunities for primitive and unconfined recreation will be preserved. These opportunities are fairly limited by the steepness of the terrain except in Hell-Roaring Canyon where hunting, horseback riding and backpacking opportunities are outstanding.

Special Features. The escarpment providing outstanding scenery from the Centennial Valley would be preserved.

Area Not Recommended

There are impacts from: off road vehicle use, snowmobile use, grazing activities, and timber harvesting.

Naturalness. Motorized vehicle use of the Keg Springs road amounts to six vehicles per day and three vehicles per day on East Dry Creek road. Much of this traffic is destined for various points on the Sheep Station. Blair Lake receives a good portion of this use for fishing. This traffic presently increases five-fold during hunting season with the most use occurring on the Sheep Station. Pioneer roads are evident wherever the terrain permits off road vehicle travel. Naturalness of an estimated 3,000 acres of the Sheep Station will continue to be affected by this use. No additional impacts are projected to increase with this alternative. Total vehicle use days are estimated at 975 and are not expected to increase in the foreseeable future. Natural values may be disturbed or eliminated by timber harvest (cutting, roads, slash) on 13,200 acres. A half-mile of fence (approximately one acre) will be constructed in the Price-Peet allotment according to designs that will not affect natural values.

Solitude. The presence of motorized vehicles (see frequency above) for recreation on approximately 3,000 acres of the Sheep Station will continue to disrupt solitude. However, the use level is not expected to increase in the foreseeable future. On the 11,700 acres open for timber harvesting, solitude will be affected by use of chain saws, bulldozers, and trucks on a seasonal basis. Timber harvesting and road building will also adversely affect opportunities for solitude by removing vegetative screening.

Opportunities for Primitive and Unconfined Recreation. Primitive recreation will be replaced and disrupted by motorized vehicles on the areas projected for logging. Logged and other disturbed areas do not generally attract horseback riding, cross-country skiing, hiking, or backpacking. Therefore, these areas would probably be lightly used for primitive recreation. Much of the Continental Divide Trail would continue to be traversed by motorized vehicles due to the availability of access to the Sheep Station through the Targhee National Forest.

The half-mile of fence in Price-Peet Creek may inhibit travel by horse but, since the use is so low in this area, the impact will be minor.

Special Features. Features on the study area such as cultural values, threatened and endangered species habitat, and scenery would be disturbed, damaged or lost due primarily to easy access on approximately 3,000 acres of the Sheep Station by motorized vehicles and development of timber on 11,700 acres. Surface disturbance from logging will reduce elk cover and grizzly bear habitat. Bears would be unlikely to occupy disturbed areas and reduced cover would displace elk. Logging will increase siltation into streams draining into Lima Reservoir and could reduce fish populations for the short term (5-10 years) by 50-100 percent on about six miles of stream. There are no known cultural sites, there will be cultural clearances prior to logging activities and identified sites would be protected.

Conclusion

Off road vehicle use in and around the Sheep Station would continue to affect solitude and natural values, and the quality of primitive recreation opportunities on 3,000 acres. Logging activities will eliminate natural values and reduce solitude on 13,200 acres. In addition, surface disturbance from logging will reduce elk cover and grizzly bear habitat. Bears would be unlikely to occupy the disturbed areas and elk would be displaced. Logging will increase siltation into streams draining into Lima Reservoir and reducing fish populations by up to 50 percent on about six miles of stream.

Effects on Recreation Use

Area Recommended

Snowmobile Use. There is negligible, if any, snowmobile use occurring on this area other than the corridor through Odell Creek, affecting one-quarter mile of recommended area. Therefore, there would be no affect.

Hunting. Wilderness designation would have little or no affect on hunting as all present hunting is nonmotorized.

Access for Motorized Vehicles. There are no vehicles on this part of the area so there would be no impact.

Area Not Recommended

Snowmobile Use. There would be no change in the pattern of use. The corridor through Odell Creek has been recommended to allow continued use of the Odell Creek trail for snowmobiling. Snowmobiling use of the Targhee National Forest and west end of the study area would continue as it currently exists. Approximately 1,600 visitor days of snowmobiling use occurs here.

Hunting. Hunting quality and opportunities would decrease to 2,480 recreation visitor days from 2,680 because of logging activities and displacement of elk.

Access For Motorized Vehicles. Roads on the west end created by logging would create new short term access but would be closed upon completion of logging activities. Table 4-18 lists the changes in recreation use for Alternative 7.

TABLE 4-18

CHANGES IN RECREATION USE LEVELS UNDER ALTERNATIVE 7

	Area Recommended for Wilderness Designation		Area Not Recommended for Wildernes Designation	
Recreation Activity	Present Use (RVDs)	Projected Use (RVDs)	Present Use (RVDs)	Projected Use (RVDs)
Hunting	500	500	2,180	1,980
Snowmobiling	0	0	1,600	1,600

RVD = Recreation Visitor Day

Conclusion

For the area recommended, hunting use levels will remain unchanged. Snowmobiling is essentially nonexistent except for the Odell Creek corridor affecting one-quarter mile of recommended area.

For the area not recommended, snowmobile use will remain unchanged. Hunting will decline by 200 recreation visitor days from 2,180 to 1,980 as a result of logging activities.

Effects on Wildlife Habitat

Area Recommended

Fall Security Habitat for Elk. There would be no change from the current situation for fall security habitat for elk.

Habitat for Threatened and Endangered Species. There would be no expected change on grizzly bear habitat.

Aquatic Habitat both Onsite and Offsite. There would be no expected change on onsite or offsite aquatic habitat.

Area Not Recommended

Fall Security Habitat for Elk. The primary impact of this alternative on elk would be the potential loss of cover effectiveness on 11,700 acres of fall and migrational habitat. The resulting decrease in elk population may require restrictions in hunting until the cover regenerated (approximately 25 years). Over the long term, fall cover effectiveness would be reduced due to road construction.

Habitat for Threatened and Endangered Species. Grizzly bear would be adversely affected on 11,700 acres by road building for logging which would increase human-related conflicts and decrease hiding cover and isolation. The bear would no longer be likely to occupy disturbed areas. However, 23,300 acres is designated as Situation 2 grizzly bear habitat providing protection for one third of the land not designated for wilderness (USDI, FWS 1986).

Aquatic Habitat both Onsite and Offsite. Fisheries and offsite waterfowl habitats would be affected by logging and road building on 11,700 acres. Fish mortality would be most significant due to short-term impacts of accelerated erosion and sedimentation from logging and road building (Bjornn et al 1977).

These impacts would be short-term (10 years or less) and would retard recovery of cutthroat and grayling populations on about six miles of onsite stream. Approximately 19,867 acres of Red Rock Lakes watershed where no development activities are projected could be maintained for wildlife values in the long term even if the study area were not designated wilderness.

Conclusion

This alternative would result in adverse impacts on elk and species of special interest. Logging would degrade 11,700 acres of fall and migrational habitat. Grizzly bear habitat would be adversely affected on 11,700 acres. Offsite and onsite fish and waterfowl habitat would be adversely affected by accelerated erosion and siltation following logging on about 11,700 acres of watershed. Up to fifty percent reductions in fish populations could be expected over the short term (5 to 10 years) on about six miles of stream.

Effects on Grazing

Area Recommended

There is no grazing occurring in this area.

Area Not Recommended

The number of AUMs assigned for livestock grazing may increase by 275 over present use, essentially all on the Targhee National Forest.

Conclusion

There would be no adverse affect on the area recommended. Livestock grazing may increase by 275 AUMs over present use in the area not designated wilderness.

Effects on Timber Harvest

Area Recommended

In the portion recommended wilderness, no suitable timber has been projected to be cut. There would be no impact.

Area Not Recommended

A total of 113.9 mmbf of timber would be available for harvest on 11,700 acres of suitable timber north of the Divide. Table 4-19 shows the relative amounts of timber available in Alternative 7.

TABLE 4-19

TIMBER RESOURCE IN ALTERNATIVE 7

	Recommended Area	Nonrecommended Area
Suitable Timber	1,500 acres	11,700 acres
Standing Volume	14.6 mmbf	113.9 mmbf
Annual Yield	0.3 mmbf	2.34 mmbf
Volume Foregone	0.3 mmbf	0 mmbf

Conclusion

About 1,500 acres of suitable timber would be foregone. A total of 2.34 mmbf of annual yield timber would be available for harvest on 11,700 acres north of the Divide.

Effects on Oil and Gas Exploration and Development

Area Recommended

There are presently 1,166 acres leased for oil and gas but there is no exploration activity and none is expected. As leases expire, they would not be reissued. At that point all further exploration and development would be precluded. This is not considered to be a significant impact as occurrence potential is rated as low for much of the area. Where occurrence potential is moderate, the area is virtually inaccessible for oil and gas development.

Area Not Recommended

There would be no effect on the oil and gas exploration and development on the nonwilderness portion of the area.

Conclusion

No development is expected. There is no impact.

Effects on Economic Conditions

The impact to the local economies was evaluated using the Forest Service IMPLAN Model (USDA, FS 1983). Employment and income changes are projected for the year 1995. Table 4-20 lists the impacts of Alternative 7 relative to the projections for the No Action Alternative.

Conclusion

This alternative would sustain 50 jobs. All economic activity would sustain $857,468 in annual income to the local economy.

ALTERNATIVE 8

Effects on Wilderness Values

Area Recommended

There are potential impacts from livestock grazing, off road vehicle use, snowmobile use, and timber harvesting.

Naturalness. There are no surface disturbing activities projected in the area recommended for wilderness. Natural values would remain undisturbed on 42,040 acres. This includes two scenic areas, the Aldous and Hancock Lake area.

Solitude. There are no plans to harvest any timber on the Targhee side however, offsite development on the Sheep Station, Tin Cup claims, motorized traffic on the Keg Springs and East Dry Creek cherry-stemmed roads through the area, and especially timber harvest operations on adjacent nonwilderness lands would continue to adversely affect solitude in areas adjacent to them. Solitude would remain unaffected in many areas on the Targhee National Forest.

TABLE 4-20

ECONOMIC IMPACTS OF ALTERNATIVE 7

Economic Resources	Projected Annual Employment 1995[1] Alternative 7	Projected Annual Employment 1995[1] No Action Alternative	Projected Annual Income 1995 Alternative 7	Projected Annual Income 1995 No Action Alternative
Timber Harvest	20	22	$461,214	$520,344
Recreation				
Snowmobiling	22	22	248,640	248,640
Elk Hunting	3	3	26,784	26,784
Livestock	5	5	120,830	123,020
Total	50	52	$857,468	$918,788

[1] Units in person years. Employment potential; no guarantee that this level of employment will occur. Estimates are for year 1995 and is not cumulative.$US

Opportunities for Primitive and Unconfined Recreation. Primitive and unconfined recreation would be preserved on the portion designated wilderness.

Special Features. There have been no cultural sites identified in this area. The area contains grizzly bear habitat (see discussion under Impacts to Threatened and Endangered Species Habitat).

Area Not Recommended

Naturalness. The west end north of the Divide and the Sheep Station would be open to motorized vehicle use (approximately 100 visitor days on the BLM land and 1600-1800 vehicles per year on the Sheep Station). Timber harvesting activities west of Matsingale Creek would detract from or eliminate natural values on 13,200 acres. These activities include removal of vegetation, slash piles, etc.

Solitude. The west end north of the Divide and the Sheep Station would be open to motorized vehicle use (approximately 100 visitor days on the BLM land and 1600-1800 vehicles per year on the Sheep Station). Timber harvesting activities west of Matsingale Creek would detract from or eliminate solitude values on 13,200 acres. These activities include removal of vegetation, slash piles, etc.

Opportunities for Primitive and Unconfined Recreation. The same actions described for naturalness and solitude will negatively impact opportunities for primitive and unconfined recreation.

Special Features. There are no known cultural resource sites in this area. No logging will be allowed prior to a cultural inventory.

Conclusion

No impacts are anticipated for the area recommended. Naturalness, solitude and opportunities for primitive recreation would be adversely affected on 13,200 acres. There would be no impact to cultural resources.

Effects on Recreation Use

Area Recommended

Snowmobile Use. Snowmobiling would be prohibited on the portion designated wilderness resulting in the loss of 1,120 visitor days from closure of the play areas (see Table 4-21). Areas most popular for play would be closed. Displaced snowmobile use would shift to play areas on the Sheep Station.

Hunting. Primitive hunting opportunities would be maintained on 42,040 acres designated as wilderness.

Access for Motorized Vehicles. Access would continue as in all alternatives via the two cherry-stemmed roads from the south, Keg Springs and East Dry Creek. There would be no impact.

Area Not Recommended

Snowmobile Use. Snowmobile use would likely shift to play areas on the Sheep Station. The Odell Creek corridor would be open. An estimated 1,600 visitor days of use would continue.

TABLE 4-21

CHANGES IN RECREATION USE LEVELS UNDER ALTERNATIVE 8

	Area Recommended for Wilderness Designation		Area Not Recommended for Wildernes Designation	
Recreation Activity	Present Use (RVDs)	Projected Use (RVDs)	Present Use (RVDs)	Projected Use (RVDs)
Hunting	1,340	1,340	1,340	1,140
Snowmobiling	1,600	480	1,600	1,600

RVD = Recreation Visitor Day

Hunting. About 200 hunting visitor days would be lost due to timber harvest in elk fall and migrational habitat in Montana west of Matsingale Creek.

Access for Motorized Vehicles. There is no impact.

Conclusion

Recreation use would decline by 1,120 snowmobiling visitor days in Idaho and 200 hunter visitor days in Montana. The snowmobile use is expected to shift to the Sheep Station increasing the visitation on the Montana side.

Effects on Wildlife Habitat

Area Recommended

Fall Security Habitat for Elk. On the portion recommended for wilderness, 42,040 acres of wildlife habitat would remain protected from development activities.

Habitat For Threatened and Endangered Species. The 42,040 acres recommended for wilderness is occasionally visited by the grizzly bear. There are no actions projected that would disturb existing habitat and the grizzly bear could continue use of this area.

Aquatic Habitat Both Onsite and Offsite. There would be no effect.

Area Not Recommended

Fall Security Habitat for Elk. On the portion not designated wilderness, 13,200 acres of elk fall and migrational habitat would be logged over a period of years. This would impact the elk through loss of security cover and presence of roads increasing the ease with which hunters can access the area.

Habitat for Threatened and Endangered Species. Grizzly bear would be adversely affected on 13,200 acres by road building for logging which would increase human-related conflicts and decrease hiding cover and isolation. The bear would be unlikely to occupy disturbed areas.

Aquatic Habitat Both Onsite and Offsite. Onsite and offsite fish and waterfowl habitat could be adversely affected by accelerated erosion on 13,200 acres and siltation due to logging on the Montana side west of Matsingale Creek. Approximately six miles of stream is expected to be affected with a decrease in fish population of up to 50 percent.

Conclusion

A total of 13,200 acres of elk fall and migration habitat would be logged in the Montana portion west of Matsingale Creek. This activity will also adversely affect offsite and onsite fisheries and waterfowl habitat. Grizzly bear habitat would be affected by logging precluding occupation of these areas.

Effects on Grazing

Area Recommended

In the portion recommended wilderness, designation would preclude the addition of 275 AUMs by not permitting projected range improvement projects. Livestock permittees could experience increased time and costs to maintain and monitor their allotments. Increases in forage stemming from a more natural role of fire would allow greater livestock management flexibility but not an increase in livestock use.

Area Not Recommended

There are no projects proposed that would increase AUM's.

Conclusion

Livestock grazing would not increase over present use.

Effects on Timber Harvest

Area Recommended

In the portion recommended wilderness, no suitable timber would be foregone. No timber harvest is proposed.

Area Not Recommended

All 128.5 mmbf of timber would be available for harvest on 13,200 acres of suitable timber north of the Divide west of Matsingale Creek. Table 4-22 shows the relative amounts of timber available and foregone in Alternative 8. There is no impact.

TABLE 4-22

TIMBER RESOURCE IN ALTERNATIVE 8

	Recommended Area	Nonrecommended Area
Suitable Timber	0 acres	13,200 acres
Standing Volume	0 mmbf	128.5 mmbf
Annual Yield	0 mmbf	2.64 mmbf
Volume Foregone	0 mmbf	0 mmbf

Conclusion

There would be no impact.

Effects on Oil and Gas Exploration and Development

Area Recommended

No development is expected because of low potential and inaccessibility. There would be no impact.

Area Not Recommended

There would be no effect on the oil and gas exploration and development on the area not recommended for wilderness.

Conclusion

There would be no impact on oil and gas development.

Effects on Economic Conditions

The impact to the local economies was evaluated using the Forest Service IMPLAN Model (USDA, FS 1983). Employment and income changes are projected for the year 1995. Table 4-23 lists the impacts of Alternative 8 relative to the projections for the No Action Alternative.

Conclusion

There would be no impact on employment or income from timber harvest.

TABLE 4-23

ECONOMIC IMPACTS OF ALTERNATIVE 8

	Projected Annual Employment 1995[1]		Projected Annual Income 1995	
Economic Resources	Alternative 8	No Action Alternative	Alternative 8	No Action Alternative
Timber Harvest	22	22	$520,344	$520,344
Recreation				
Snowmobiling	22	22	248,640	248,640
Elk Hunting	3	3	26,784	26,784
Livestock	5	5	110,998	123,020
Total	52	52	$906,766	$918,788

[1] Units in person years. Employment potential; no guarantee that this level of employment will occur. Estimates are for year 1995 and is not cumulative.

CHAPTER 5
CONSULTATION AND COORDINATION

ISSUE IDENTIFICATION

Issue identification began during the wilderness inventory of the Centennial Mountains Instant Study Area and the adjacent roadless areas on the national forests. Whether or not to include the Sheep Station in the wilderness study became the dominant issue. Between 1980 and 1982, intensive coordination between the federal agencies included organizations and individuals interested in the resolution of this issue. The issue was resolved by Congress in late 1981 when it removed the Sheep Station from jurisdiction of the Bureau of Land Management. In effect, this removed the station from the wilderness study provision of Federal Land Policy and Management Act, and the lands were dropped from further study.

A proposed decision, which was announced in the July 12, 1982 *Federal Register*, recommended 72,886 acres be studied for wilderness designation and 7,194 acres be dropped from further study. The public was asked to comment on the decision. Seventy letters were received. Forty-two favored either wilderness designation or continued wilderness study. Sixteen opposed continued wilderness study or wilderness designation. The rest indicated no preference.

As a result of the public input, an additional 212 acres of the Targhee National Forest, which did not meet wilderness criteria, were dropped from further study. This final decision was announced in the *Federal Register* on January 14, 1985. A 30-day protest period was provided. No protests were received and the decision to include 72,674 acres in the study area became final on January 15, 1985.

The January 14, 1985 *Federal Register* notice also announced the intent of the BLM and Forest Service to complete a joint environmental impact statement. The environmental impact statement would evaluate the impacts of wilderness designation and other alternatives on the study area.

The scoping process for the environmental impact statement began in February 1985. An issues mailing was sent to 375 individuals and organizations. The mailing outlined a tentative set of issues and requested comments. Ninety-two responses were returned. The comment analysis can be found in Appendix A.

CONSULTATION AND COORDINATION

Public consultation and coordination efforts were encouraged throughout the wilderness study process as mandated by the BLM and Forest Service planning regulations (43 CFR Part 1601), the Council on Environmental Quality regulations (43 CRF 1501.7 and 1506.6) and the Wilderness Act (Section 3d). The goal of the BLM and Forest Service throughout this study was to prepare a plan that would be as consistent as possible with public concerns at all levels. Public information was solicited during the wilderness study in order to identify key issues, important resource values, and ultimately a sound wilderness suitability recommendation.

Several meetings with groups and individuals took place as the environmental impact statement was being written and after it was published. Table 5-1 lists the meetings.

Formal consultation took place with the Fish and Wildlife Service, Endangered Species Field Office in Helena, Montana concerning the grizzly bear and peregrine falcon. They concurred with the determination that the proposed action in the draft environmental impact statement would have no effect on these species. (See Letter 49 in Appendix M.)

DISTRIBUTION

The draft environmental impact statement was distributed to all the agencies and organizations listed below. In addition, copies were sent to all individuals who responded to the issues mailing, the media, and local libraries. The agencies and organizations which commented on the draft are indicated by an asterick.

Federal Agencies

Advisory Council on Historic Preservation

Army Corps of Engineers

TABLE 5-1

PUBLIC INFORMATION MEETINGS TO DISCUSS THE ISSUES ADDRESSED IN AND STATUS OF THE CENTENNIAL MOUNTAINS WILDERNESS EIS

Date	Organization	Number of Individuals Involved
February 1985	Louisiana Pacific	1
March 1985	KIDK Idaho Falls TV Interview	broadcast audience
May 1985	Pintlar Audubon Society	15
August 1985	Greater Yellowstone Coalition	45
September 1985	Beaverhead County Commission	3
September 1985	Montana Department of State Lands	2
September 1985	Stoltze Lumber Company	2
September 1985	Butte District Advisory Council	7
August 1985	Idaho Environmental Council	1
September 1985	Sierra Club	1
October 1985	Dillon Chamber of Commerce	17
October 1985	KDBM-Dillon radio interview	broadcast audience
November 1985	Montana Wilderness Asso.	5
December 1985	Beaverhead Planning Board	20
December 1985	Montana Snowmobile Association	2
December 1985	Fugowee's Snowmobile Club	1
December 1985	Island Park Sportsmen's Association	1
December 1985	Idaho Forest Industries	1
December 1985	Fremont County Recreation Board	1
December 1985	Louisiana Pacific	1
December 1985	Fremont County Commissioners	3
January 1986	Clark County Commissioners	3
March 1986	Idaho Dept. of Fish and Game, and Wyoming Dept. of Game and Fish	30
May 1986	Bill Cunningham	1
February 1987	Governor's Planning Task Force	9
February 1987	Governor's Wilderness Advisory Committee	7
March 1987	Greater Yellowstone Coalition	3
March 1987	Wilderness Society	2
April 1987	Butte District Advisory Council	10

Formal consultation took place with the Fish and Wildlife Service, Endangered Species Field Office in Helena, Montana concerning the grizzly bear and peregrine falcon. They concurred with the determination that the proposed action in the draft environmental impact statement would have no effect on these species. (See Letter 49 in Appendix M.)

Department of Agriculture
- Forest Service
- Sheep Experiment Station*
- Soil Conservation Service*

Department of Air Force*

Department of Energy

Department of Housing and Urban Development

Department of Interior
- Bureau of Indian Affairs*
- Bureau of Mines
- Bureau of Reclamation
- Fish and Wildlife Service*
- Geological Survey
- Mineral Management Service
- National Park Service

Department of Transportation

Environmental Protection Agency*

Federal Energy Regulatory Commission

Nuclear Regulatory Commission

Native American Tribes

Shoshone—Bannock Tribe*

Congressional

U.S. Senator Max Baucus
U.S. Senator Jake Garn
U.S. Senator James McClure
U.S. Senator Conrad Burns
U.S. Senator Steven Symms
U.S. Representative Larry Craig
U.S. Representative Ron Marlenee
U.S. Representative Richard Stallings
U.S. Representative Pat Williams

State Agencies

Harriman State Park
Idaho Department of Fish and Game*
Idaho Department of Health and Welfare
Idaho Department of Lands
Idaho Department of Parks and Recreation
Idaho Department of Tourism and Industrial Development
Idaho Department of Water Resources
Idaho State Clearinghouse
Idaho State Historical Society*
Montana Air National Guard
Montana Bureau of Mines
Montana Department of Agriculture

Montana Department of Fish, Wildlife and Parks
Montana Department of Health and Environmental Sciences
Montana Department of Livestock
Montana Department of Natural Resources and Conservation
Montana Department of State Lands
Montana Environmental Quality Council
Montana State Historical Preservation Office*
Montana State Intergovernmental Review
Montana State University
Northwest University
Office of the Governor—Idaho
Office of the Governor—Montana*
Oregon State University
University of Idaho
University of Montana
University of Oregon
University of Wisconsin
Western Montana College
Wyoming Department of Game and Fish

Local Agencies

Beaverhead County Commissioners
Beaverhead County Planning Board
Clark County Commissioners
Fremont County Commissioners*
Fremont County Recreation Board
Hot Springs Planning Board
Madison County Extension Agent

Organizations and Businesses

AEC Sportsmen's Club
Alberta Wilderness Association
American Motorcyclist Association
American Wilderness Alliance*
Associated Logging Contractors*
Atlantic Richfield Company
Beaverhead Chamber of Commerce
Beaverhead Forest Concerned Citizens*
Big Buck Sportsmen's Club
Big Sky Land and Leasing
Blue Ribbon Coalition*
Breneman Ranch*
Butte District Advisory Council
Butte District Grazing Advisory Board
Butte Mineral and Gem Club
C and B Timber
Centennial Ranch*
Chevron, USA INC
Conoco
Conservation Endowment*
Consolidated Georex Geophysics
Continental Divide Trail Society*
Dave's Marina*
Defenders of Wildlife
Dillon Chamber of Commerce
Eastern Idaho Motorcycle Dealers Asso.*
F.H. Stoltz Land and Lumber Company
Five Valleys Audubon Society*
Fugowee's Snowmobile Club*
Golden Sunlight Mine
Great Bear Society*
Greater Yellowstone Coalition*
Hagenbarth Livestock*
Hamilton Brothers Oil Company
Hamilton Ranches*
Headwaters Paddling Asso.*
Idaho Alpine Club
Idaho Conservation League
Idaho Environmental Council*
Idaho Forest Industries*
Idaho Natural Areas Coordination Committee
Idaho Natural Resources Legal Foundation
Idaho Outfitters and Guide Board
Idaho Pole Co.*
Idaho Public Lands User Asso.*
Idaho Stud Mill
Idaho Trail Machine Association
Idaho Wildlife
Institute for Ecological Studies
International Forest Resource Council
International Snowmobile Industry Association
Island Park Chamber of Commerce*
Island Park Sportsmen Association
J.R. Simplot Company
Kerr McGee Corporation
Landmark Insurance Corp.*
Last Chance Audubon Society*
Louisiana—Pacific Corporation*
Montana Audubon Council*
Montana Cattlemen's Association
Montana East Side Forest Practice Committee*
Montana Environmental Information Center
Montana Land and Mineral Owners Association
Montana Petroleum Association
Montana Power Company*
Montana Snowmobile Association*
Montana Trail Bikeriders Asso.*
Montana Water Development Association
Montana Wilderness Association*
Montana Wildlife Federation
Montana Wildlife Fund
Montana Woolgrowers Association*
National Wildlife Federation*
National Wildlife Refuge Association
National Woolgrowers Asso.*
Nature Conservancy
Nevada Outdoor Recreation Asso.*
Noranda Exploration Inc.
North Fork Club
Northern Rockies BLM Task Force*
Northwest Cancer Center*
Outdoor Resource Center, Inc.
Pintlar Audubon Society*
Pomeroy Brothers Construction*
Pond's Lodge*
RV Country Inc.*
Resource Planning & Management Associates*
Sierra Club
Sixty-three Ranch*
Skyline Sportsmen's Association, Inc.
Snowmobile West Magazine*
Sohio Petroleum Company
Sportsman's Club, Island Park*
Stockgrower's Asso.*
Stoltze Lumber Company*
Sunwest Yamaha*
Teton Ranch*

Texaco, Inc.
Thompson Engineering Inc.*
Three-R-Sales, Inc.*
Trumpeter Swan Society
Union Carbide Corporation
Utah Geographic Series*
Valley View Trailer Park*
West Yellowstone Snowmobile Club
Western Environmental Trade Association
Western Forest Industry
Wilderness Institute U of M
Wilderness Society*
Wildland Research Institute
Wildlife—Wildland Institute

PUBLIC PARTICIPATION

The draft Centennial Mountains Wilderness Study and Environmental Impact Statement was filed with the Environmental Protection Agency in March 1987. The draft was released to the public on February 27, 1987 with comments accepted through June 19, 1987. A news release and a Federal Register Notice on March 20, 1987 carried a notice of availability and announced the public hearings. Three public hearings were held; Table 5-2 summarizes the details of the hearings. The proceedings of the hearings are reproduced in Appendix M.

TABLE 5-2

PUBLIC HEARINGS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Place	Date	Number Testifying	Total Number Attending
Helena, MT	June 2, 1987	7	9
Dillon, MT	June 3, 1987	19	44
Idaho Falls, ID	June 4, 1987	17	42

About 1,000 copies of the draft document were distributed to government agencies, businesses, organizations, grazing lessees, and interested individuals. A total of 43 individuals gave testimony at the public hearings. Table 5-3 lists their names and affiliation. The speaker number can be used to locate each person's testimony in the hearing record which is reprinted in Appendix M.

A total of 148 letters were received. Table 5-4 lists the writers and their affiliation. The letter number can be used to locate each individual letter which is reprinted in Appendix M.

COMMENT ANALYSIS OF TESTIMONY AND LETTERS

Commenter Profile

The individuals commenting on the draft usually were familiar with the Centennial Mountains or southwestern Montana and eastern Idaho. Sixty-two percent of the commenters lived in Montana, twenty-three percent in Idaho, and fifteen percent outside the two-state area. Business people in the recreation, ranching, and timber industries sent in comments; as did organizations representing environmental and recreation interests. Federal, state, and local government agencies with jurisdiction in this area also commented as well as one Indian tribe.

TABLE 5-3

SPEAKERS AT PUBLIC HEARINGS

Speaker Number	Name	From/Representing
1	Clifton R. Merritt	American Wilderness Alliance
2	Ed Dobson	Northern Rockies BLM Task Force
3	Bob Bushnell	Montana Snowmobile Asso.
4	Sue Jackson	Montana Audubon Council
5	Beverly Magley	Montana Wilderness Asso.
6	Cedron Jones	Helena, MT
7	Thomas France	National Wildlife Federation
8	Wayne Montgomery	Lima, MT
9	Mark Simonich	F.H. Stoltze Land & Lumber Co.
10	Al Luebeck	Beaverhead Forest Concerned Citizens of Butte
11	Mike Mosolf	Billings, MT
12	Tom Breneman	Breneman Ranch
13	Michael J. Lyngholm	Stoltze Lumber
14	John S. Kirkley	Pintlar Audubon
15	Lucy M. Hayden	Dillon, MT
16	Linda Ellison	Montana Trail Bikeriders Asso.
17	Jane Stanisich	Butte, MT
18	Barry Reiswig	Red Rock Lakes Wildlife Refuge
19	David Hartwell	Conservation Endowment Fund
20	John Taft	Centennial Ranch
21	Louisa Willcox	Greater Yellowstone Coalition
22	Dan Heinz	American Wilderness Alliance
23	Joan Montagne	Montana Wilderness Asso.
24	Joe Helle	Montana Woolgrowers Asso., National Woolgrowers Asso., Stockgrowers Asso.
25	Parke Scott	Dillon, MT
26	Kevin Rush	Lima, MT
27	Ruth Gale	Idaho Falls, ID
28	David Skidmore	Idaho Falls, ID
29	Jerry Scheid	Idaho Environmental Council
30	Lee R. Martin	Idaho Falls, ID
31	Stan Glenn	Louisiana Pacific Corp.
32	Marty Huebner	Idaho Falls, ID
33	Tom Worden	Idaho Forest Industries
34	Jerry Janye	Idaho Falls
35	Clark Collins	Blue Ribbon Coalition
36	Hal Augusin	Pond's Lodge
37	David Fowler	Dave's Marine
38	Jerald Baument	3-R-Sales Inc.
39	Bert Lilburn	Idaho Public Lands User Asso.
40	Steve Janes	Snowmobile West Magazine
41	Tara Rhatchatourian	Sportsmans Club, Island Park Forest Roundtable
42	Kaye Walker	Sunwest Yamaha, RV Country Inc., and Eastern Idaho Motorcycle Dealers Asso.
43	Ken Shepard	Idaho Falls, ID

Issues Addressed

The issues raised during the public comment period are listed in order of the number of commenters who raised the issue. Wilderness designation, economics, the Sheep Station, unstable soils, aquatic habitat, and threatened and endangered species were the issues of greatest concern to those commenting. Table 5-5 shows relative interest in each issue. An issue that was discussed by 15 or fewer commenters is not analyzed in this section.

TABLE 5-4
COMMENT LETTERS

Letter Number	Name	From/Representing
	Federal Agencies	
44	Susan Roth	Agricultural Research Service
45	Elton D. Scheideman	Air Force
46	Glen H. Loomis	Soil Conservation Service
47	John F. Wardell	Environmental Protection Agency
48	Norris M. Sall	Bureau of Indian Affairs
49	Dale Harms	Fish & Wildlife Service
50	Robert W. Young	Fish & Wildlife Service
	State Agencies	
51	Jerry M. Conley	Idaho Fish & Game
52	Thomas J. Green	Idaho State Historical Society
53	Ralph Driear	Office of the Governor, Montana
54	Alan L. Stanfill	State Historic Preservation Office
	Local Government	
55	James Siddoway Weldon Reynolds Grant Chandler	Fremont County Commission
	Native American Tribes	
56	Susan Ball	Shoshone Bannock Tribes
	Businesses	
57	Charles M. Bagley, Jr.	Northwest Cancer Center
58	Sandra Cabill	Sixty-three Ranch
59	Frank M. Gillingham	Landmark Insurance Corp.
60	James F. Hagenbarth	Hagenbarth Livestock
61	Roger Hamilton	Hamilton Ranches
62	Vince Heier	Idaho Pole Co.
63	Tara Khatchatourian	Valley View Trailer Park
64	Michael T. Lynholm	F.H. Stoltze Land & Lumber Co.
65	Floyd W. McCubbins	F.H. Stoltze Land & Lumber Co.
66	William R. Meiners	Resource Planning & Management Associates, Inc.
67	Rich Reese	Utah Geographic Series
68	D.M. Sprague	Montana Power Company
69	Lyle I. Thompson	Thompson Engineering Inc.
70	Edmund S. Twining	Teton Ranch
	Organizations	
71	Robert M. Ballou	Montana Audubon Council
72	Craig Barnes	Headwaters Paddling Asso.
73	Elaine Burns	Island Park Chamber of Commerce
74	Clark L. Collins	Blue Ribbon Coalition Inc.
75	Jim Dayton	Five Valleys Audubon Society
76	Glen English	Fugowee
77	Edward Dobson Thomas France	National Wildlife Federation
78	Paul Fritz	American Wilderness Alliance
79	Dan Heinz	American Wilderness Alliance
80	Dan Heinz	Northern Rockies BLM Task Force
81	Sue Jackson	Last Chance Audubon Society
82	Cedron Jones	Montana Wilderness Asso.
83	Dr. Loren Kreck	Montana Wilderness Asso.
84	Leo Musselman	Associated Logging Contractors
85	Lance Olsen	The Great Bear Society
86	James Phelps	Montana State Audubon Council
87	Michael D. Scott	The Wilderness Society
88	Mark A. Simonich	Montana East Side Forest Practices Committee
89	Don. R. Stoecker	Pintlar Audubon Society
90	Charles S. Watson, Jr.	Nevada Outdoor Recreation Asso.
91	Louisa Wilcox	Greater Yellowstone Coalition
92	James R. Wolf	Continental Divide Trail Society

Letter Number	Name	From/Representing
	Individuals	
93	H. D. Allred	Dillon, MT
94	Lou Antonich	Townsend, MT
95	Wm Armstrong	Dillon, MT
96	Rod & June Ash	Condon, MT
97	George F. Baggley	Boise, ID
98	Dennis Baird	Moscow, ID
99	Walter S. Boardman	Port Orange, FL
100	Thomas K. Bray	Virginia City, MT
101	Gordon H. Brown	Driggs, ID
102	Stephan B. Brumbach	Idaho Falls, ID
103	William A. Burgan	Billings, MT
104	Alan Burnaby Charles L. Burnaby	Dillon, MT
105	Robert Burns	Ketchum, ID
106	Tom Caples	Long Island City, NY
107	Maureen Carey	Noxon, MT
108	Edward Clement	Salisbury, NC
109	Jeffrey Crook	Sandy, OR
110	Bill Cunningham	Frenchtown, MT
111	Mr. & Mrs. C.R. Cunningham	Hamilton, MT
112	John Daggett	Shepherd, MT
113	Susan Dejmal	Bozeman, MT
114	Jerry Furtney	Bozeman, MT
115	David A. Gabriel Carole A. Gabriel	Helena, MT
116	Steven D. Gehman	Bozeman, MT
117	Craig J. Gehrke	Boise, ID
118	Barb Gorges	Miles City, MT
119	Alan R. Harmata	Bozeman, MT
120	Mortimer L. Hart	Butte, MT
121	C. M. Hauptman	Billings, MT
122	Archie Hayden Mildred Hayden	Dillon, MT
123	Darlene Hildreth Ray Hildreth	Dillon, MT
124	Wendy Hildreth Bryce Hildreth	Dillon, MT
125	Donna Hodges Keith Hodges	Helena, MT
126	Wilma R. Immonen	Butte, MT
127	Don B. Jackson	Big Sky, MT
128	Robert N. Jones	Salt Lake City, UT
129	Kenneth R. Katsma	Idaho Falls, ID
130	Elizabeth Scheid Kessell	Tacoma, WA
131	Joel H. Kessell	Tacoma, WA
132	Glenn E. Keyes Gladys H. Keyes	Dillon, MT
133	George Laknar Ellen Laknar	Dillon, MT
134	Margaret Laknar Larry Laknar	Dillon, MT
135	Cary B. Lund	Helena, MT
136	Miriam I. Lyngholm	Dillon, MT
137	Charles Mabbott	Darby, MT
138	Mollie Matteson	Missoula, MT
139	Carley McCaulay	Great Falls, MT
140	Malcolm S. McLelland	Kalispell, MT
141	Kay Merriam	Pocatello, ID
142	Don Merritt	Helena, MT
143	Doris Milner	Hamilton, MT
144	L.M. Minich	Butte, MT
145	Fred Missbuechler	Dillon, MT
146	Carl D. Mitchell	Lima, MT

TABLE 5-4 (Continued)
COMMENT LETTERS

Letter Number	Name	From/Representing
147	Glenna Morrison Kenneth Morrison	Dillon, MT
148	Arlene G. Moss Don B. Moss	Dillon, MT
149	Ray Nelson Ella Fay Nelson	Dillon, MT
150	Heather Noble	Lewiston, ID
151	Thomas L. Noland	Pullman, WA
152	William Park Meg Park	Dillon, MT
153	Dorothy Patent Gregory J. Patent	Missoula, MT
154	Charles E. Peterson	Victor, ID
155	William Peterson	Litchfield, MN
156	Margaret Pettis	Hyrum, UT
157	Scott Ploger	Idaho Falls, ID
158	Sally Pryor	Bedford Hills, NY
159	Fred W. Rabe	Moscow, ID
160	Roy Rasmussen	Helena, MT
161	Gail Miller Richardson	Missoula, MT
162	P. Brian Rogers	Bozeman, MT
163	Noel Rosetta Irene Rosetta	Helena, MT
164	Judith Rueston	Troy, MT
165	Barbara Rybeck	Eureka, CA
166	Claudia Schaeffer	Dillon, MT
167	Gerald H. Scheid	Idaho Falls, ID
168	Michael G. Schmidt	Gaylord, MI
169	Dick Sorensen	Island Park, ID
170	Daniel Southard	San Diego, CA
171	Kate Stafford	Felton, CA
172	Delores E. Stoddard Spence Stoddard	Dillon, MT
173	John R. Swanson	Minneapolis, MN
174	Roy Thierry	Sterling Heights, MI
175	Jason H. Thom	Billings, MT
176	Gordon Thompson	Clancy, MT
177	Ethel W. Thorniley	Detroit, MI
178	Sara Toubman	Helena, MT
179	Marlen Tweten	Missoula, MT
180	Matt Urick	Melrose, MT
181	Tobi Van Dyck	Chicago, IL
182	Mrs. Ron Ward	Island Park, ID
183	Fred Weber	Dillon, MT
184	Al Wells	Missoula, MT
185	Janell R. Wheeler S. Rene Wheeler	Dillon, MT
186	Gary Williams	Dillon, MT
187	Bob Wilson	Lima, MT
188	Richard C. Wilson	Des Plaines, IL
189	George Wuerthner	Missoula, MT
190	Charlie Young	Lima, MT
191	Tom Pomeroy	Pomeroy Brothers Construction

TABLE 5-5
ISSUES OF CONCERN

Issue	Number of Commenters
Wilderness Designation	150
Economics	80
Agricultural Research Station	60
Unstable Soils and Water Quality	43
Aquatic Habitat	38
Threatened and Endangered Species	34
Timber	24
Elk Habitat	20
Snowmobiling	19
Grazing	12
Visual Qualities	11
State Lands	10
Minerals	6
Hunting	4
Continental Divide Trail	4
Oil and Gas	1

Wilderness Designation

Half the commenters supported wilderness designation for the Centennials. Most of these supporters felt the final environmental impact statement should recommend more land for wilderness. One-fourth of the commenters opposed wilderness designation for the Centennials. The remaining commenters indicated no preference.

Economics

Economic conditions was the issue receiving the greatest number of comments. For the most part commenters questioned the scope of the analysis and suggested additional factors or a change in emphasis. Many mentioned below-cost timber sales; others focused on adverse impacts to local communities.

Agricultural Research Service

Studying the Sheep Station for wilderness was raised by many commenters even though this issue was not discussed in the draft document. The commenters argued that the Sheep Station should be included in the wilderness recommendation. Several letters cited case law and the National Environmental Policy Act as indicating that such lands as the Sheep Station should be included in a wilderness study.

Unstable Soils and Water Quality

Concern over unstable soils and water quality was expressed by many of those commenting. For the most part they expressed concern that road building would have unacceptable impacts on these resources. Comments from the timber industry indicated that adverse impacts could be mitigated.

Aquatic Habitat

Concern for aquatic habitat outside the study area in Montana was expressed by many commenters. Many mentioned that the Red Rocks National Wildlife Refuge and trumpeter sway habitat in Lima Reservoir depend on good watershed management in the Centennials. Grayling habitat in the streams draining the Centennials was also a concern.

Threatened and Endangered Species

Grizzly bear habitat as an extension of the Greater Yellowstone Ecosystem was mentioned by many commenters. The major concern was to protect such habitat to accommodate increases in population from Yellowstone National Park. Wolf, peregrine falcon, bald eagle, and several rare plant species were also mentioned.

Timber

Commenters mentioning timber mainly expressed two divergent views. Many said the timber was of low quality and slow growing. Others contended the timber was of good commercial grade and easily harvested.

Elk Habitat

Most commenters mentioning elk habitat felt that logging would adversely affect fall migrations in the Montana/Idaho area. Comments from the timber industry stated such impacts could be mitigated.

Snowmobiling

Most commenters mentioning snowmobiles requested that the Odell Creek snowmobile trail remain open for winter use. They stressed the low potential impact snowmobiling has on any other resource.

COMMENTS AND RESPONSES

All comments were reviewed and considered. Table 5-6 shows the responses to comments that:

- relate to inadequacies or inaccuracies in the analysis or methodologies used,
- identify new significant impacts,
- recommend reasonable new alternatives,
- involve disagreements on interpretations of significance, or
- indicate significant misconceptions or misinterpretations of BLM or Forest Service programs and policies.

Appendix M displays the comment letters in the numerical order shown in Tables 5-3 and 5-4. Comments which meet the criteria listed above are assigned a comment number. These comments and the agencys' response are shown in Table 5-6.

The comments and responses are arranged by topic in Table 5-6. Except for editing of misspelled words or obvious errors in punctuation, most comments are printed verbatim. In many cases, credit for the same comment was given to several contributors. The response to a comment either identifies that a change was made or provides rationale for why a change was not considered necessary.

TABLE 5-6
COMMENTS AND RESPONSES

Section A
Wilderness Values

Comment

A-1 The study states that wilderness designation would not produce a long-term increase in recreation use. The only basis I can see for that seems to be a discussion on Page 30, under "Projected Visitor Trends" and it says that following designation of the wilderness area in the Refuge in 1976, there was no significant increase in use. But then right under that it gives the figures of recreational use for '81, '82, and '83, and it is not clear if they are talking about entire Refuge use or just wilderness use, but the figures show a 6 percent increase in '82 over; '81 and an 18 percent increase in '83 over '82. Well, that seems like a pretty significant increase in use to me, and maybe there is a contradiction there . . . I think that there will, in fact, be significant long-term increases in wilderness use if the area were designated wilderness. [Comment Index Number: 6, 56, 82]

Response

A-1 It is agreed that the use figures for the Red Rock Lakes National Wildlife Refuge Wilderness do not provide a proper basis to forecast the long-term change in recreation use if the area were designated wilderness. Further discussions with refuge personnel reveal the data included refuge and wilderness use, and data solely for wilderness use is not available.

The possibility does exist that the release and development of roadless areas on Montana's National Forests could concentrate and increase use on designated wilderness. It is also possible as stated on page 42 of the draft Environmental Impact Statement that population growth in the northwest will have a major impact on demand for wilderness. However, this assumes that the rate of participation in primitive recreation will increase as population increases. Correct use data for wilderness areas in Forest Service Region I reveal a decline in use from 1982 to 1986, despite population increases. It appears that no conclusive statement can currently be made concerning the long-term affect of wilderness designation on the amount of use; other than to say that designation can lead to short-term increases. Increased publicity of an area will normally increase use. Pages 42, 30, and 56 of the draft Environmental Impact Statement have been revised to reflect this view.

Comment

A-2 I believe the southern boundary is at an awkward location in many places. By that, I mean at the middle of the slope. Could not protection against certain kinds of adverse development be considered for the full slope beyond the location proposed. In other words, could not a more natural boundary be worked out greater than what is now proposed? [Comment Index Number: 86]

Response

A-2 The Southern boundary was originally mapped as a management area boundary in the Centennial Mountain Land Use Plan that was published in 1973. The same boundary was also used as a management area boundary in the Land Management Plan published in 1984.

The existing boundary has been in use by Forest personnel for the past 15 years. During that time it has proved to be a workable boundary.

If the area were to be designated wilderness, it may be advantageous to relocate the boundary in some places to provide greater ease of administration.

Comment

A-3 Explain how each planning criterion and quality standard was applied to determine the various alternatives. This is necessary because it is not clear why Alternatives 1 and 4 through 8 exist in their present form. Was there some support for each of the 8 Alternatives? Please explain. [Comment Index Number: 77]

Response

A-3 A variety of alternatives were identified by the interdisciplinary team to assure a fair evaluation of the various possibilities of management schemes for the Centennials.

Comment

A-4 In regard to the failure to recommend any Idaho lands for Wilderness, independently explore and explain the wilderness qualities, or lack thereof, of the following areas: (1) west of Scalp Creek; (2) between Scalp Creek and Tin Cup Road; and (3) east of Tin Cup Road. [Comment Index Number: 77]

Response

A-4 Wilderness qualities are discussed in a general manner in Chapter 3. For more detailed information, the Targhee Forest has the initial inventory data available upon request.

While it is agreed that the entire area contains natural character and that outstanding solitude is readily available, the recommendation was based on other factors. Direction in the Targhee Land Management Plan was judged to be more appropriate than wilderness designation. The plan protects critical resources such as elk and other wildlife, but allows continued snow machine use. It also keeps the option available to use motorized equipment for soil and watershed restoration.

Comment

A-5 There is no doubt that this area meets all of the wilderness criteria, all of the criteria under the Wilderness Act, all 92,000 acres of it: The size criteria, the naturalness criteria, the primitive recreation, the opportunities for primitive recreation, solitude criteria, the manageability criteria. The Targhee National Forest, which manages the Idaho side of the Centennials and over half of the study area, did not recommend a single acre for wilderness. This land also meets all the criteria. [Comment Index Number: 1, 21, 34]

Response

A-5 The fact that an area meets the criteria for wilderness designation does not mean it will necessarily be recommended only that it is suitable for study.

Lands on the Targhee National Forest were not recommended, because in the judgment of Forest Service officials, management direction in the Targhee Land Management Plan is more appropriate for the area.

Targhee Forest Plan direction provides for an increase in elk population, protects other important wildlife habitat, allows snowmobile use to continue, and keeps the option available to use motorized equipment for soil and watershed restoration work.

Section B

Snowmobile Use

Comment

B-1 Page 30, Projected Visitor Trends, paragraph 2: "Wilderness designation would not substantially reduce existing opportunities for off-road vehicle use during the summer season." "The one exception would involve snowmobile use which could increase in some areas" appears to contradict the statement in the Summary, Page ii, Alternative 2, paragraph 2, which states that "no recreation vehicle access will be allowed and all current snowmobile use will be eliminated" . . . If no other adverse wildlife or environmental concerns would result, it might be possible to exclude Odell Creek Canyon (6,350 acres) or some similar area from wilderness designation and to allow snowmobile recreation while maintaining other wilderness values through sound management practices. [Comment Index Number: 47]

Response

B-1 The statement on page 30 of the draft EIS was intended to describe snowmobile opportunities which might occur if the area was not designated wilderness. See also response E-1.

The Wilderness Act of 1964 precludes off-road vehicle use including snowmobile use. Special legislation would be required, as is being recommended in all but the All Wilderness Alternative, to provide a corridor in Odell Creek to allow continued use as a loop trail by snowmobiles.

Comment

B-2 To what extent does existing snowmobile use constitute a trespass on the wilderness study area, on the primitive area, and on private lands like the Taft Ranch? How long have such trespasses occurred? How many citations have been issued? What other measures does BLM take to discourage these and the Price Peet-Blue Creek motor vehicle trespasses? [Comment Index Number: 77]

Response

B-2 Snowmobile use does not constitute a trespass on the wilderness study area if:

such use does not violate other off road vehicle restrictions such as the restrictions in the Price-Peet area during the hunting season (October 15 to November 30) and the winter game range period (December 1 to May 15).

no physical impacts are occurring to other wilderness study lands which would diminish recreation values.

Snowmobile use is not allowed within the primitive area, and any such use is in violation of BLM regulations.

Snowmobile use on the Taft ranch without permission of the ranch would constitute a trespass.

It is not known how long snowmobile trespasses on BLM-administered or private lands have occurred. Most of the trespasses occur after heavy snowfalls close all but snowmobile travel throughout the Centennial Valley. Snowmobile patrols by BLM from Monida, Montana have found evidence of violations (tracks) but no illegal use has been directly encountered, and thus no citations have been issued.

Whenever possible physical barriers have been constructed to restrict illegal snowmobile use.

Signs indicating that snowmobile use is not allowed have also been erected at obvious entry points. The assistance of other federal or state officials in the area have been requested in regard to enforcing the off road travel restrictions.

Comment

B-3 My only opposition to this is I would like to see a snowmobile route through Odell that's open after hunting season to stop the hunters from harassing the game, as this is the only route through the entire range which is accessible and gets a lot of traffic at the present and I would like to see that continue. [Comment Index Number: 26]

Response

B-3 Preference is acknowledged, but it must be mentioned that such current use is in violation of BLM regulations governing primitive areas. (See also response B-1).

Section C

Hunting

Comment

C-1 You paint a picture in the document that any development, logging and road building in particular, will result in a decrease of the elk population. You also say that elk hunting opportunities may be lost in Montana. We are dealing with an interstate transitory herd that by nature of its migrational habits will often be moving from the study area to their wintering grounds during the hunting season.

To place the blame of lost hunter opportunities onto logging and development is inappropriate. At the worst, logging may temporarily displace some elk in the immediately adjacent drainages. But there is no evidence to link logging to actual reduction in elk numbers. Actually, development of the study area may lead to increased hunter opportunities by improving access into the area. [Comment Index Number: 9]

Response

C-1 In order to provide for hunting opportunities during the big game season, sufficient security cover must exist and road construction must be kept to a minimum. Logging activity which reduces security cover and increases the amount of roading reduces elk hunting opportunities in the area by forcing them to other areas with effective habitat cover.

In order to mitigate the effects of logging activities on elk populations and hunting opportunities, ORV travel closures are often initiated. A case-in-point is the Price-Peet road closure near the northwestern portion of the study area. Timber harvests have occurred in the area in the past several years. With the exception of the main road, this area is now closed to all vehicles during the hunting season. The entire area is also closed to all vehicles during the period the area is used by elk as a winter game range, December 1 to May 15. Without the closure, most of the elk population would be forced to Idaho, thus reducing hunting opportunities to Montanans.

Section D

Continental Divide Trail

Comment

D-1 The EIS fails to mention the importance of preserving the natural integrity of 35 miles of the Continental Divide Trail with a wilderness designation for the greater area. [Comment Index Number: 1]

Response

D-1 The EIS has been revised in regard to Alternative 2, All Wilderness, to indicate the additional benefits which could result for the Continental Divide Trail.

Comment

D-2 Cite the congressional authority for the Continental Divide Scenic Trail. Show the proposed location on a map. To stay on the Continental Divide, the trail must cross the sheep station. What potential conflicts arise and are they manageable? [Comment Index Number: 77]

Response

D-2 The Congressional authority for the Continental Divide Trail was based on the original National Trails System Act, P.L. 90-543, and the subsequent amendment of P.L. 90-543 by the various sections of P.L. 95-625, and P.L. 96-199. The Continental Divide Trails' proposed location is shown on the Existing Impacts to Wilderness Values Map.

A memorandum of understanding is being developed between the Agricultural Research Service, Bureau of Land Management, and Forest Service to provide use of the Sheep Station along the Continental Divide Trail. Most of this trail was signed during the summer of 1989. The Agricultural Research Service has some concerns about use of the trail and potential conflicts with their operations. It is the assumption that these conflicts can be mitigated.

Section E

Access for Motorized Vehicles

Comment

E-1 While you are emphasizing your intentions to manage the nonwilderness lands for wildlife habitat and fishery concerns, you seem to be overlooking the fact that the much-mentioned ORV degradation you are attempting to address is directly tied to that wildlife resource. Your environmental impact statement asserts that much of the ORV damage is the result of illegal hunting and fishing. Well, illegal or not, doesn't this perhaps suggest a need that's not being met? With the dwindling base in the semiprimitive motorized category of lands available for recreational use because of the amount of lands tied to other wilderness proposals, what you are really doing here is pushing the problem off and onto some other land manager or other lands elsewhere. Montana Trail Bike Riders Association does not believe this document has fully addressed this issue. [Comment Index Number: 16, 35, 55, 74]

Response

E-1 The major restriction resulting from wilderness designation would be to activities which involve the use of motorized or mechanical equipment. However, as pointed out under the heading, Projected Visitor Trends, page 30, of the draft EIS; wilderness designation would not substantially reduce existing opportunities associated with off road vehicle (ORV) use during the summer season. Due to wildlife and watershed concerns, a need would still exist to maintain ORV controls. In addition, steep terrain in much of the study area precludes ORV use. The one exception would involve snowmobile use which could increase in some areas.

The draft further states, "It is expected that the amount of hiking, backpacking, and horse riding and packing may increase slightly, especially if trailheads are established."

These types of primitive recreation activities are conducive to, and can be expected to be pursued in wilderness settings.

Access road construction for recreation activities would also be substantially restricted due to the steep terrain, and to watershed and wildlife concerns.

The net impact to motorized or mechanized recreation between designation and nondesignation would be relatively small. The one exception could involve snowmobile use which may increase in some areas. It is not anticipated snowmobile use restrictions would transfer use in such a magnitude to other, surrounding lands that problems would result. The present level of snowmobile use in the study area is relatively small—approximately 600 visitor days per year. Public lands surrounding the study area offer substantial snowmobiling opportunities with few current use conflicts or problems.

Comment

E-2 Under Alternatives 2 and 8, all land to the south would be designated as wilderness. Although it is stated, under both Alternatives that access to the USSES through these lands would continue to be maintained, ARS is concerned about how this would be done. Will access be designated for government use only; will the location of the road be convenient for USSES operations; would road closure be proposed for certain times of the year; which agency would fund road maintenance, etc? If either Alternative is selected, the Act of Congress so designating the wilderness area must provide for the ARS access. [Comment Index Number: 44]

Response

E-2 The East Dry Creek, Taylor Creek, Keg Springs and the Tin Cap roads are cherry-stemmed from the wilderness study area. The Keg Springs and East Dry Creek roads would remain open to public use regardless of wilderness designation. The Targhee Forest Plan provides for these roads to be brought up to standards needed to protect soil and water resources.

Maintenance of the roads will continue to be the responsibility of the Forest Service regardless of future classification.

Comment

E-3 Recreation is not enhanced by wilderness designation. There are far more recreationists using the area now that would be eliminated by the wilderness designation. I'm speaking of motorized recreationists, snowmobilers, trail bikers, four-wheelers. They haven't destroyed the area yet, and I don't know why we are to believe that they are going to destroy that area if not eliminate it.

In a lot of wilderness areas, trails are lost and recreation opportunities eliminated rather than improved by wilderness designation. Several of the motorized recreation groups participate willingly in volunteer trail maintenance that improves the trail system for all users to enjoy. That type of trail maintenance is eliminated in wilderness areas. [Comment Index Number: 35]

Response

E-3 It is agreed that motorized recreation in wilderness areas is not enhanced. However, other forms of recreation (primitive) are enhanced. It is our recommendation that a corridor be provided in Odell Creek during the winter months to enhance snowmobiling opportunities. Trails sometimes are a management tool used to enhance recreation use of wilderness and protect the resource values by distributing use. Many areas receive volunteer assistance from user groups to maintain trails, both motorized and nonmotorized.

Section F

Threatened and Endangered Species Habitat

Comment

F-1 The DEIS fails to adequately assess the impacts of proposed actions and to protect habitat necessary for the recovery of the peregrine falcons. The DEIS fails to show, however, how activities in the CMWSA such as logging and road building will affect suitable nesting habitat.

Since peregrines are sensitive to pollutants, particularly chlorinated hydrocarbons (GYC Rpt., P. 27), it is critical that the DEIS show how the use of present and proposed compounds in the area will affect this endangered species. In particular, the use of fertilizers and herbicides on the Sheep Experiment Station and other federal lands could have serious adverse impacts on peregrine falcon reproduction. However, the DEIS totally fails to discuss such critical issues. These deficiencies must be corrected in the revised EIS. [Comment Index Number: 18, 21, 66, 90, 91, 107, 116, 178]

Response

F-1 The peregrine falcon is responding very well to management strategies which include the peregrine falcon reintroduction effort in cooperation with the Peregrine Fund. Results of this six-year effort are very encouraging and the effort will continue under all alternatives.

Methods being used are hack tower release sites and hacking from cliff sites. At least two wild pairs produced young over the past two years.

Protective measures are implemented on sites being used for hacking and that will continue. Potential sites for future hacking are determined cooperatively with the Peregrine Fund and that will continue. Any use of pesticides in the Centennials requires consideration of potential impacts on threatened and endangered species whether or not the area is designated for wilderness. Because of the historical use of chemicals on the Sheep Station, a collection of prey samples should be taken to determine pesticide trends in potential prey.

The BLM and Peregrine Fund are very optimistic about the results thus far, and the reintroduction effort will continue. There is much public support for the program underway in the Centennial Valley.

Comment

F-2 The DEIS fails to recognize the essential connection between grizzly bears in the Centennials and the rest of the Greater Yellowstone Ecosystem. Although recognizing that the Centennial Study Area itself does no support a discrete population of grizzlies, the DEIS does note that the IGBST judged the area to suitable grizzly bear habitat when considered as part of the Yellowstone population (DEIS P. 38). However, the DEIS failed to adequately consider the grizzly bear habitat in this context, or to take necessary measures to protect this habitat for current and potentially expanding grizzly bear use. Additional information about grizzly bear sitings is provided in the GYC Report, Table 3. Besides the current bear activity in the CMWSA, noted grizzly bear scientists, including Frank Craighead, place great importance on the Centennials as ideal habitat for grizzlies dispersing from Yellowstone. Climatic conditions, such as drought, the loss of available quality habitat as a result of development elsewhere, and/or an expanding population could make the Centennials a key refuge for grizzly bears at certain times.

The Preferred Alternative and DEIS should be revised to recognize and protect the important ecological link between the Centennials and the Greater Yellowstone Ecosystem for grizzlies, and all other species discussed in these comments.

The plan fails to provide adequate protection of critical grizzly bear habitat, as required under the Endangered Species Act, the Grizzly Bear Recovery Plan, and the Interagency Grizzly Bear Guidelines. The mandate and specific management requirements for the threatened grizzly population in the Greater Yellowstone Ecosystem is well established. The 1973 Endangered Species Act (ESA), as amended, states (Pl 93-205, Sec. 7(a)(2)) . . .

Grizzly bears survive on approximately 1 percent of their historic range in the continental United States. The estimated 183 to 207 grizzlies living in the Greater Yellowstone represent one of perhaps three viable populations remaining in the lower 48 states. Servheen (1986) estimates that the grizzly population in the Yellowstone Ecosystem is currently declining at the rate of 1-2 percent per year. Knight and Eberhardt (1985) project a continued long-term decline in approximate accord with the trend of the female population index. The Knight and Eberhardt Study concludes that the difference between stable or increasing grizzly numbers and downward population trend may be one or two additional female mortalities per year.

In 1975, the US Fish and Wildlife Service listed grizzlies in the lower 48 states as a "threatened" species under the Endangered Species Act . . . The ESA directs that "all federal departments and agencies shall seek to conserve listed species." (Id. at SS 1531 (C), see also SS 1531 (A)(1)). "Conserve" is defined in part as "the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this chapter are no longer necessary." (Id at SS 1532 (3)) . . .

In light of the Recovery Plan, failure to fully implement the Guidelines in wilderness plans would not only violate the Endangered Species Act's mandate to conserve the grizzly, it would also jeopardize the bear's continued existence.

It is well documented that one more of the following conditions will decrease the quality of grizzly bear habitat, which will in turn hinder the recovery of the population (Reid, 1986):

1. Degrading quality of ungulate habitat, especially critical ungulate winter range, spring migration (transitional) habitats, and to a lesser degree, elk rutting habitats.

2. Displacing a preferred later stage of forest succession with an unpreferred earlier phase of succession.

3. Increasing open road density in preferred ungulate and grizzly habitats.

4. Failure to adequately remove road beds in preferred grizzly habitat, or to plant those road beds with foods utilized by grizzlies.

5. Permitting high densities of people and intensive human activities in preferred grizzly habitat.

6. Improving grizzly habitat near private inholdings or popular human destinations such as campgrounds.

7. Removing security cover and/or important components such as denning or thermal (bedding) cover.

A number of these conditions have existed in the past and will continue to occur in the CMWSA if the draft plan is implemented as written . . . These deficiencies must be corrected in the revised EIS, in order to comply with the ESA, the guidelines, and the Grizzly Bear Recovery Plan. [Comment Index Number: 1, 2, 5, 21, 65, 71, 74, 78, 85, 87, 91, 109, 113, 116, 145, 156, 167, 177, 184, 189]

Response

F-2 The location of the Centennial Mountains to the core Yellowstone ecosystem region provides a movement corridor for bears from Yellowstone National Park and adjoining Targhee National Forest. Early inventories conducted by the Interagency Grizzly Bear Study Team showed no viable year-round population, although observations have been recorded especially during spring months. Maintenance of habitat integrity is a primary concern to provide habitat for grizzlies that may emigrate onto the area. The Centennial Mountains provide potentially important habitat when the adjoining lands in Idaho are also considered. The size of the total ecosystem is the most limiting factor considering home range movements of radioed grizzlies in Yellowstone National Park and considering the Centennial Mountains are isolated by a valley from the core Yellowstone area. (USDI, BLM 1979b).

Acquisition of lands adjacent to public lands will be important in order to prevent further subdivisions in the Alaska basin and adjoining Centennial Valley which will be detrimental to plans to expand grizzly populations in the area.

The Centennial Mountain range was not included in the Montana Recovery Plan (Brown 1982) area as occupied territory. The recovery plan received statewide review before being finalized.

The grizzly bear ecosystems and management area does not include the Centennial Mountain range (USDI, NPS 1987).

Traditional uses in the Centennial Mountains and adjoining valley include grazing, recreational use, hunting, fishing and some logging in this semi-primitive environment. More recently, there has been an expansion of subdivisions in the area, especially in the Alaska Basin watershed. Subdivision and development could well be the most significant impact to grizzly bear recovery and use of the area now and in the future.

The Centennial Mountains have not been officially considered a Situation 2 area by the Interagency Bear Study Team. A Situation 2 area was designated on the Targhee National Forest, although no wilderness areas are proposed.

The Fish and Wildlife Service, Endangered Species Office, based on their biological assessment, determined "no effect" to the grizzly bear (and peregrine falcon) as a result of the BLM wilderness proposal (see Letter 49). The Fish and Wildlife Service also did not determine any positive effect as a result of the wilderness proposal.

There is a concern that the Fish and Wildlife Service did not adequately assess the impacts of increased subdivision and development on adjoining private lands in the Alaska Basin and adjoining areas that could impact the grizzly bear (e.g. dump sites, human activity, etc.). "Housing construction in bear habitat inevitably creates conflict. Because bears are not inhibited by the presence of subdivisions in their traditional habitat . . ." (USDI, NPS 1987).

The Grizzly Bear Compendium states (USDI, FWP 1987), "While many studies document reduced grizzly bear use of logged areas (Perensovich 1966, Russell 1974, Lyon and Basile 1980, Mace and Jonkel 1980b, Zager et al. 1983), others report no evidence that logging impacts grizzlies (Meehan 1974, Zager 1980a). Aerial surveys over a 6 year period in the northwestern U.S. and southern Canada showed no changes in grizzly bear populations and little reduction in the number of cubs produced per year as logging pressure increased, however, bear home ranges were substantially reduced during this period (Mace and Jonkel 1980b). These conflicting results suggest that while bear numbers may not be immediately affected by logging activities, their behavior is almost certainly modified."

Comment

F-3 The DEIS does not adequately assess the Centennial's relationship within the Greater Yellowstone Ecosystem. Of particular concern is how proposed developments, utilizing the timber resource, and range resource will impact the grizzly population and other "Species of Special Concern": wolverine, lynx, hoary marmot, great grey owl, goshawk, sharp-shinned hawk, Coopers hawk, golden eagle, prairie falcon, and long-eared owl. [Comment Index Number: 1, 34, 80, 90, 91, 112, 119, 127, 150, 181, 188]

Response

F-3 The following statement has been added to the Final EIS in the Cumulative Impacts section: Portions of the study area, particularly the eastern portion, are considered by some to be a part of the Greater Yellowstone Ecosystem. The preferred alternative will not adversely affect resources of the Greater Yellowstone Ecosystem because management, as outlined in the Targhee Forest Plan, will maintain the area's undeveloped character.

The Targhee Forest Plan was evaluated by the U.S. Fish and Wildlife Service for potential effects upon the grizzly bear and other threatened or endangered species. It was their opinion that management actions proposed in the plan would not jeopardize the existence of the grizzly bear or other threatened or endangered species.

Five of the eight alternatives presented in the DEIS would designate all or part of the Targhee portion of the study area as wilderness. All alternatives were carefully considered and evaluated.

Comment

F-4 In regard to the discussion of endangered species throughtout the document, I did not see any mention of whooping cranes. In recent years, whooping cranes have utilized the Centennial Valley during the summer months. The area may be beneficial in establishing a viable population in the western United States. While the study area probably does not contain any crane habitat, management of the study area affects the watershed of the habitat. Whooping cranes should be included in the EIS. [Comment Index Number: 90, 175]

Response

F-4 No whooping cranes have been observed nor is there any possibility that they would be observed within the Centennial Mountains, coniferous forest complex.

There have been reports of one seen on the Red Rock Refuge but the refuge and adjoining river valley is not a part of this proposal.

The cranes, if seen on the refuge, probably came from Greys Lake in Idaho where Fish and Wildlife Service and State of Idaho have been working on reestablishment of a local population.

The Centennial Mountains wilderness proposal is not potential habitat for waterfowl. Waterfowl habitat is well off the area under consideration by the wilderness classification so little if any impact is anticipated that would effect the whooping crane and waterfowl such as the trumpter swan.

Comment

F-5 Within the Centennials there is a high diversity of macro- and micro-environments which has resulted in a great number of vascular plant taxa. In a 1968 survey of the Red Rocks Refuge and the Centennial Mountains, Bob Dorn found 487 species in 243 genera and 63 families (approximately 21 percent of the State's flora), (GYC Rpt, p. 91). "Such high floristic diversity in a comparatively small area is always of phytogeographic interest." (Id. at p. 91) . . . Species of Special Concern in Montana by the Natural Heritage Program: *Allium acuminatum; Astragalus terminalis; Carex multicostata; Carex vallicola; Castilleja gracillima; Haploppapus nanus; Kobresia simpliciuscula; Lesquerella carinata; Liqusticum filicinum; Pteryxia hendersonii; Ranunculus jovis; Senecio debilis; Stephanomeria spinosa; Thelypodium sagittatum.* The DEIS entirely fails to mention the existence of these species, to discuss what will happen to them when the plan is implemented, or to ensure that they will be protected until assessed for suitability for listing by the Montana Natural Heritage Program. Field inventories are needed in many cases to define the exact location of the rare plant species in the region . . . The DEIS must be revised to determine basic locations of known rare plant species, to inventory the area for new populations and species, and to develop management schemes which will protect these species and populations. [Comment Index Number: 91]

Response

F-5 The Centennial Mountains provide very diverse habitats that support some 362 taxa of vascular plants, representing 190 genera in 43 families. Comprehensive inventory of the Centennial Mountains taxa was undertaken in 1979 by P.P. Lowry II in cooperation with the herbaria at Montana State University, Bozeman, where collections of vascular plants were cataloged for the Herbarium. R.D. Dorn listed well over 400 species of plants from the Red Rocks Lakes National Wildlife Refuge and adjacent Centennial Mountains (Dorn 1977 and 1968). Fox listed well over 100 species of plants from the Sheep Station summer range (USDI, BLM 1968).

The flora of the Centennial Mountains is extremely unique and deserves special management consideration.

Early work in that area indicates three species that could be classified as threatened or endangered:

Lesquerella carinata, *Erigeron rydbergii*, and *Kelseya uniflora*

More recent work by Lesica, indicates other vascular plants may be considered for federal listing as threatened or endangered (Lesica 1984).

This list includes:

Aquilegia jonesii, Astragalus ceramicus var. *apus, Calamagrostis tweedyi, Cardamine rupicola, Carex parryana* spp. *idahoa, Carex plectocarpa, Claytonia lanceolata* var. *flava, Cryptantha sobolifera, Draba apiculata* var. *daviesiae, Erigeron allocatus, Eriogonum lagopus, Grindelia howellia, Howellia aquatilis, Penstemon caryi, Penstemon lemhiensis, Phlox kelseyi* var. *missoulensis, Rorippa calycina, Saussurea weberi, Silene spaldingii, Sullivantia hapemanii, Synthris canbyi,* and *Trisetum orthochaetum*.

Comment

F-6 The DEIS fails to adequately consider and minimize the impacts of the proposed plan on bald eagles, as required by ESA. There is no doubt that bald eagles use the CMWSA. In fact, two pairs have nested successfully in the east end of the Centennial Valley . . . The DEIS admits for foreseeable impacts on water quality necessary for fish production, and on seclusion as a result of increased access. However, the document fails to examine the relationships of these impacts to the survival of bald eagles. Specifically, the DEIS states that should the plan be implemented 6100 acres would be logged, which would "adversely affect cutthroat trout habitat by increasing erosion and sediment production . . ." (DEIS, page 53). The failure to conduct the necessary analysis of such impacts on the endangered bald eagle, required under NEPA and the ESA, is a serious deficiency and must be corrected in the revised EIS. [Comment Index Number: 21, 91, 119]

Response

F-6 The bald eagle is a very important species within the Centennial Mountains complex. The Step 3 Recommendation from the Management Framework Plan for the Dillon Resource Area (USDI, BLM 1979b) directs BLM to provide protection and management of this species in that area.

Currently, the BLM is an active participant with the Greater Yellowstone Bald Eagle Working Group and guidelines and recommendations developed by the working group are applied to the area, including habitat protection and management. The BLM will continue to work with the working group and coordinate and implement guidelines and recommendations desired for the protection and enhancement of bald eagle habitat.

The Fish and Wildlife Service, Office of Endangered Species has completed a formal biological opinion for the Montana Bald Eagle Management Plan. The biological opinion includes the area under this proposal as a part of the Yellowstone Ecosystem. The opinion was that the proposed management plan is not likely to jeopardize the continued existence of the bald eagles. The BLM will however, continue to request assistance from Fish and Wildlife Service on any action that may impact the bald eagle and request both informal and formal consultation under Sec. 7 of the Endangered Species Act.

Comment

F-7 The DEIS fails to recognize the unique potential of the Centennials in aiding in the recovery of the Rocky Mountain Wolf in the Greater Yellowstone Ecosystem. The DEIS also fails to assess the impact of proposed activities on wolves or to ensure the protection of quality habitat necessary for this threatened species, as required by NEPA and ESA . . . The Centennials is the only major natural land bridge connecting the Greater Yellowstone Ecosystem with another ecosystem that contains a wild and free-roaming wolf population. Only the Centennials can provide the important habitat necessary to allow wolves to reintroduce themselves naturally into the Greater Yellowstone Ecosystem . . .

However, the DEIS fails to appropriately assess the important potential role of the Centennials in wolf recovery in the Greater Yellowstone Ecosystem. In fact, the document contains no discussion of this subject. The DEIS must be revised to consider these critical issues and to ensure that this natural land bridge in the CMWSA remains intact under the direction of the preferred alternative.

The fact that wolves are presently not known to occur in the CMWSA does not relieve the agencies from the responsibility of assessing impacts of proposed activities on wolf habitat, required by NEPA and ESA. [Comment Index Number: 21, 91]

Response

F-7 The BLM will continue to monitor for wolf use in the Centennial Mountain range, but present information would indicate the area is not being used by wolves, especially when one considers no domestic sheep mortality has been attributable to wolves.

The Secretary of Interior recently announced that no wolves would be reintroduced into the Yellowstone ecosystem.

Comment

F-8 On a map, identify any Situation 1 and Situation 2 grizzly habitat in the WSA. If any such area is not recommended as wilderness, explain why any development should be allowed. Include such lands in the supplemental EIS. [Comment Index Number: 77]

Response

F-8 A map showing the location of Situation 2 grizzly bear habitat has been added in Chapter 3. There is no grizzly bear habitat in the Continentals classified as Situation 1.

Comment

F-9 In addition, the DEIS shows little analysis of cumulative impacts of the implementation of the plan on wildlife and fisheries. A display of information about how and where habitat has been and will be lost and fragmented is critical to understanding what will happen to species over time under the proposed management direction. It is also essential to assessing the long-term viability of populations in the CMWSA.

The Plan, however, thoroughly fails to discuss its progress in the only cumulative effects analysis now occurring in the Ecosystem—the Grizzly Bear Cumulative Effects Analysis Model. The plan should be revised to assess the progress of the Beaverhead and Targhee forests in implementing this model, and to expand this approach to all endangered and sensitive species, Management Indicator Species, and Species of Special Concern. Information on developing and applying practical, simple and effective cumulative effects analysis is available both within the Forest Service, Park Service and state game agencies, and among conservation biologists in the academic community. The Coalition is eager to participate in this process, if desired.

Furthermore, the DEIS fails to assess how the Plan will affect the long-term viability of populations and species. Will the preferred alternative reduce any of the species or populations to the point where they are no longer viable? Are any of the populations already below the minimum level of viability, and if so, how will the Plan remedy this problem?

Response

F-9 *Grizzly Bear*—The Bureau of Land Management is an active participant and funding supporter for the overall Interagency Grizzly Bear Committee. "Grizzly Bear Compendium" prepared by managers and conservation organizations and published in 1987. The issues you have raised concerning impacts and mitigation measures are valid. The BLM uses this document as a reference in managing the Centennials. Due to the amount of information contained in the Compendium, it would be difficult to cite each and all management considerations addressed (540 pp.). However, the recommendations will be used by our agency. The BLM has also received a formal opinion from the Fish and Wildlife Office of Endangered Species that there is no effect impact to the grizzly within the study area.

The study area would be advantageous to the grizzly with its low-level of human disturbance and habitat alteration.

Threatened and Endangered Species—The environmental impact statement addresses the success of the Peregrine Falcon Reintroduction project in the Centennial Valley. The BLM is pleased with the results of this project. BLM has been a major funding source for this project and supports continuing this effort in cooperation with the Peregrine Fund and Montana Department of Fish, Wildlife and Parks.

The trumpeter swan does not occupy habitat on the study area, so the environmental impact statement did not get into a lot of detail on this species. The habitat for the trumpeter swan is within the valley on Red Rocks and adjoining BLM and state lands some distance from the study area. The population has been increasing on habitat on public lands in that area.

Arctic grayling/cutthroat trout—The BLM currently has a monitoring program in place which includes fisheries habitat on the study area. This monitoring has gone on for at least 4 years and is coordinated closely with Montana Department of Fish, Wildlife and Parks fisheries biologist and refuge personnel.

The concern about sheep grazing on the Sheep Station could best be addressed by the Sheep Station.

Overall the habitat on the study area is not in a degraded condition. The area is very valuable fish and wildlife habitat and it is reflected in the rich flora or fauna that exist on the area. Inventories and studies related to threatened and endangered and candidate plant species are planned in cooperation with the Montana Rare Plant Project.

Section G

Fall Migration Habitat for Elk

Comment

G-1 We feel that the EIS is biased against logging due to the statements about the modification of elk habitat which will result from logging. It should be remembered that the Montana Elk-logging Study, which was 15 years in the making, is still just a guideline. There is nothing in the study which says that logging leads to a reduction in hunting or elk populations. My 20 years of working in the woods has repeatedly shown me and any other component biologist that wildlife finds security around logging activity during hunting season. The logging activities have not harmed elk populations during the rest of the year other than through momentary displacement. Let the first rifle shot be fired and the elk will go where they feel it is safe—adjacent to a logging operation. [Comment Index Number: 18, 50, 64, 65, 71, 78, 90, 103, 107, 116, 167, 189]

Response

G-1 The Centennial Mountains provide superior elk range during the spring, summer, and fall months. The habitat size would be the main limitation in terms of the area's potential to hold elk. Little if any winter range is available due to the northerly exposure and therefore, lack of open wind-swept winter range slopes. Since size (acreage) is a primary limitation, the importance of existing timber stands cannot be over emphasized. The existence of unroaded areas is also important to elk management in the Centennials.

Timber harvesting and associated roads have the potential of reducing elk security cover and, therefore, reducing the quality and quantity of this habitat. Timber harvesting, if implemented on any site, must be mitigated to maintain the requirements of all big game species. However, the major concern in this discussion is elk due to the importance of the area for this species.

Comment

G-2 The DEIS fails to adequately assess or mitigate the impacts, singular and cumulative, of oil and gas development, road building, timber harvest, motorized vehicle use, and grazing on elk and other big game species . . . Of particular concern is the protection of adequate security cover, a major limiting factor of ungulates in the arid and open Greater Yellowstone Ecosystem. [Comments Index Number: 91]

Response

G-2 The Centennial Mountains provide superior habitat for elk, moose, black bear and mule deer. Maintaining habitat integrity is especially important to present and future elk management of the area. With the size (acreage) being a limitation for elk, maintenance of roadless areas and security cover is paramount. Developmental activities on forest land, specifically logging and its associated roads, have the potential to drastically modify elk habitat, not to the benefit of elk or quality elk hunting.

Comment

G-3 Yet on page 52, in a discussion on effects on wildlife habitat, they state that 10,700 acres of elk fall and winter habitat are recommended for wilderness designation and a total of 5,500 acres of present similar habitat are not. At the close of the first paragraph on page 52, the DEIS states that 5,500 acres of "elk habitat may be disturbed in the short-term by timber harvest . . ." The effects of this amount of acreage of habitat loss to the elk population in the area should be addressed in the final EIS. Included in the discussion should be the size of the population affected and the average life span of the Rocky Mountain elk. This information would assist in accurately determining the significance of the impact and the relative term of impact. [Comment Index Number: 47]

Response

G-3 The 10,700 acres referred to in the document has had very little disturbance and land use changes, in other words it's land that would meet the criteria of unaltered, primitive elk range.

The 5,500 acres referred to are lands that have been subject to recent logging and roading activity.

Regeneration data for the Centennial Mountains is lacking, but conifer regeneration capable of providing hiding cover for elk, 5 to 8 feet in height could take 25 to 30 years based on past regeneration in the area.

Comment

G-4 There is a difference in the amount of affected acres of elk habitat and the certainty of the impacts, as reported on page 52. [Comment Index Number: 47]

Response

G-4 The difference in the number of affected acres of elk habitat is the result of a typographical error. The correct number is 2,500 acres of elk fall migrational habitat and 3,000 acres of elk winter habitat which may be logged. These acres are not additive but occupy the same area.

Section H

Moose and Other Big Game Habitat

Comment

H-1 On pages 10 and 37 of the DEIS, the status of the moose is discussed in a fashion that is inadequate . . . (1) The Shiras moose is a distinct subspecies which has a very limited distribution in Montana and adjacent states; (2) It is a habitat specialist which is exceedingly vulnerable to human induced changes in land use; and (3) The Centennials are located in the center of the distribution of Shiras moose.

Because this subspecies is distinctive, has limited distribution, is vulnerable to impacts, and has small population sizes, careless management could easily make it a threatened subspecies. If there is any area where the Shiras moose should be given thorough discussion and priority consideration, it is in the Centennials. The revised EIS should begin the process of giving the Shiras moose the attention and protection it deserves. Specifically, a research and monitoring effort should be launched to address such questions as: What portion of the total moose habitat do the Centennials represent? How does this portion relate to the whole? How do various management actions affect behavior and distribution? Future management directions should be adjusted to implement the findings of this research and monitoring program, in order to maintain the viability of this unique population. [Comment Index Number: 18, 50, 56, 91]

Response

H-1 The most comprehensive study of moose in the area was done by Robert Dorn (Dorn 1970). No intensive investigations of moose and moose habitat have been done in the Centennial Mountains, although Montana Department of Fish, Wildlife and Parks information indicates the population is stable or increasing.

Logging and associated roads could affect moose and moose habitat. Small openings may encourage vegetation such as succulent forbs, desired by moose; but additional road development could well be detrimental.

The moose issue deserves more intensive study and research. Winter range (off the Centennial Mountain range) is limited and willow, the main browse species on the winter range, has been in a continual downward trend on the refuge.

Harvest quotes are designed to improve winter range conditions. Summer range on the BLM lands is very good at the present time. It is not the function of an environmental impact statement to provide detailed, site-specific monitoring plans. Specific habitat management objectives and monitoring methods are treated in management plans. Their inclusion in the environmental analysis process would be confusing and cumbersome.

Comment

H-2 In general, the Centennial Wilderness Study fails to provide essential information necessary to evaluate effects of the preferred alternative on wildlife and biological diversity. The Plan's treatment of habitat conditions, monitoring, and management standards for wildlife is particularly poor. Therefore, the EIS is inadequate to assure the public that wildlife and fisheries will be maintained under the proposed Plan. [Comment Index Number: 91]

Response

H-2 For wildlife and fisheries monitoring please refer to Dillon Resource Area Monitoring Plan (USDI, BLM 1981a). Also monitoring is being coordinated with the Montana Department of Fish, Wildlife and Parks as well as the Fish and Wildlife Service. It is not the function of an environmental impact statement to provide detailed, site-specific monitoring plans. Specific habitat management objectives and monitoring methods are treated in management plans. Their inclusion in the environmental analysis process would be confusing and cumbersome.

Comment

H-3 One of the most glaring deficiencies of the Plan is its complete lack of a coherent monitoring and enforcement program designed to ensure the protection of species and habitat. How will agencies know if standards such as water quality are being exceeded, or if declines in arctic grayling spawning success result from erosion due to sheep grazing? [Comment Index Number: 91]

Response

H-3 It is not the function of an environmental impact statement to provide detailed, site-specific monitoring plans. Specific habitat management objectives and monitoring methods are treated in management plans. Their inclusion in the environmental analysis process would be confusing and cumbersome (See also response to comment I-4).

Comment

H-4 Bighorn sheep, once abundant in the Centennials, is one of the three species known to be extinct in the area. The DEIS states that: "suitable habitat remains; however, it is believed that historically bighorn probably migrated to suitable winter habitats. Reestablishing historical migrations is not practical at this time. For this reason, the introductions of possibly non-native mountain goats was approved." DEIS, p 37.

This explanation does not make sense. If suitable habitat remains, how can it not remain at the same time? Or does it only remain for the introduced goats? Barring unacceptable levels of competition, what precludes the agencies from reintroducing bighorns at this time? Careful examination of potential bighorn sheep winter range should have been conducted, and an analysis of the practicality of reintroduction of bighorn sheep made prior to transplanting an exotic species. The reintroduction of non-native species should never take priority over a native one, especially one so abundant elsewhere in Greater Yellowstone and so successful at recolonizing formerly occupied areas.

The DEIS must be revised to explore the possibility of reintroducing bighorn to the Centennials. Modifications of the current domestic sheep grazing programs in the CMWSA to accommodate the bighorn and to avoid disease transmission to the wild population must be also examined. These measures must be instituted if reintroduction occurs. [Comment Index Number: 91]

Response

H-4 Limiting factors for reestablishing bighorn sheep in the Centennial Mountains would include lack of winter range and possible competition with domestic sheep.

The Montana Department of Fish, Wildlife and Parks has recently published criteria for bighorn sheep reintroduction. These criteria are as follows.

Criteria for determining priority:

1. Potential for meeting the statewide and regional bighorn sheep objectives as outlined in the Strategic Plan (MDFWP 1986).
2. Potential for future hunting of the herd.
3. Preference will be given to those areas which had historical populations and still contain suitable habitat.
4. Preference will be given those sites not in close proximity to domestic sheep and those with limited competition from other domestic livestock or wild ungulates.
5. Preference will be given to those sites with a majority of public land and/or legal access in order to assure the huntability of the herd in the future.
6. Only those sites with landowner approval forms completed and signed will be approved.
7. To reduce the possibility of introducing disease into an existing population, transplants will generally not be authorized to augment established herds of 100 or more animals.

Comment

H-5 The DEIS fails to address the issue of bison in the CMWSA. Although it mentioned their former abundance in the area, the document did not discuss whether or not sufficient habitat remains to support a reintroduced bison population, or the practicality of such an introduction . . .

Bison could play an important ecological role in the CMWSA and the adjacent refuge lands, by aiding in the process of nutrient cycling in a cold, high elevation area noted for slow rates of decomposition. Although this service is partly provided by livestock today, bison could perform this function better by allowing deteriorated riparian areas to be restored.

(Bison tend to hang in riparian areas less than cattle.) . . .

Bison have never been known to transmit brucellosis to cattle, and do not necessarily compete for forage, due to some differences in food preferences. [Comment Index Number: 91]

Response

H-5 Reintroduction of bison into the Centennial Valley would require careful evaluation of habitat potential and land uses.

Comment

H-6 When and how will the determination be made whether mountain goats are exotic? [Comment Index Number: 77]

Response

H-6 The mountain goat is native to Montana and has been considered for possible reintroduction in the Centennial Mountains. However, the amount of suitable habitat and winter range, wind-swept high elevation ridges, has been determined by Montana Department of Fish, Wildlife and Parks as reason for not seriously considering a transplant.

Section I

Aquatic Habitat Both Onsite and Offsite

Comment

I-1 If implemented, the Plan could actually endanger or threaten certain populations such as the sensitive trumpeter swan, arctic grayling or cutthroad trout, as the result of development action that seriously degrades important habitat . . .

Recent declines in the population size and productivity of those swans which permanently reside in the tri-state area (Montana, Idaho, and Wyoming) now raise serious questions about their long-term survival (Gale, 1987). It is clear that if this unique population is to be recovered, careful management of nesting and forage habitat on the refuge, Lima Reservoir, and upstream areas in the Centennials is required . . .

The DEIS entirely fails to recognize the important connection between habitat upstream of the refuge and Lima Reservoir and the survival of trumpeter swans. Yet, heavy sedimentation, originating from disturbances upstream, is known to damage the waterweed and other aquatic vegetation eaten by swans. In addition, man-caused pollution and watershed abuse by domestic livestock, logging and roading have been identified as major negative factors affecting swan survival (GYC Rpt. p. 95). If sedimentation and pollution are allowed to continue and accelerate as proposed by the Management Plan, the continued existence of the distinct tri-state swan population could be jeopardized. In particular, Red Rocks Refuge and Lime Reservour, and important staging area for subadult swans, could be seriously degraded as a result of intensive logging upstream—an impact not mentioned in the EIS . . . "Off-site factors, such as human disturbance, may have a bearing on trumpeter swan survival, but the interrelationship is not clear at present" (DEIS, p. 38). This statement entirely misses the point. Although it is true that there is much that is not known about such complex interrelationships, there is at this time, sufficient information upon which to base intelligent management directions (Gale, 1987) . . .

The DEIS must be revised to include available information about this vulnerable population, and to take every precaution to ensure its continued survival. [Comment Index Number: 21, 50, 59, 91, 101, 113, 119, 127, 146, 153, 156, 158, 167, 178]

Response

I-1 Trumpeter swans do not inhabit the Centennial Mountains complex, which is primarily coniferous forest and does not provide habitat important to the trumpeter swan. Trumpeters are found on the Red Rock Wildlife Refuge and adjoining river valley habitat.

Public lands in the river valley adjacent to the refuge are receiving special management consideration to enhance trumpeter swan production and use through the Red Rock River—Lima Habitat Management Plan (wildlife activity plan).

Watershed protection within the Centennial Mountains is an important goal of BLM multiple-use management especially where cold water fisheries habitat is involved.

The impacts of livestock grazing, logging, and road building are under careful evaluation through the Dillon Monitoring Plan.

Comment

I-2 The only native population of arctic grayling in Montana is found in the Centennials. A Species of Special Concern, grayling is considered an effective indicator of overall habitat quality, particularly spawning streams (GYC Rpt. p. 98). The reason is that grayling are easily impacted by poor substrate conditions, pollution, excessive turbidity, and low water flow in spawning streams . . . Refuge managers have initiated an active research and management program, involving telemetry and transplanting studies, as well as plans for rehabilitating degraded but formerly significant spawning streams. Furthermore, U.S. Fish and Wildlife Service is currently negotiating with private landowners for an easement along Odell Creek to protect grayling spawning habitat (GYC Rpt. p. 145) . . .

The DEIS should be revised to complement the fisheries conservation effort of these agencies.

The DEIS fails to recognize the important ecological connections of the fisheries in the Greater Yellowstone Ecosystem, particularly the relationship between the fish in Red Rock Lakes Refuge and upstream portions of CMWSA. This deficiency undermines both full disclosure requirements of NEPA and the downstream management efforts to protect grayling on the refuge . . . The revised EIS must recognize the important interjurisdictional connections of the fisheries resource, document the cumulative impacts of proposed activities, and place highest priority on protecting the irreplaceable fisheries of Greater Yellowstone . . .

Although recognized as a Species of Special Concern, arctic grayling is identified as "extirpated" on page 10 of the DEIS. This is not true! These fish live in small portions of the CMWSA, specifically Upper Red Rock Creek and Hell Roaring Creek, Corral Creek, Antelope, Tom and Odell Creeks (GYC Rpt. Figure 13). The DEIS should be revised to reflect this reality . . .

There is currently substantial evidence to show that water quality in the Centennials is currently deteriorating as a result of intensive development . . . If the plan is implemented as written, this trend can be expected to continue, with serious and potentially irreversible impacts on the fisheries resource . . .

These impacts are known to occur as a result of inappropriate logging and road building on unstable soils upstream, overgrazing by livestock and bank encroachment by livestock and livestock trampling, and dewatering for agriculture (Id. at p. 144). In areas of high soil erosion and steep slopes, as occur in the Centennials, a synergistic negative effect has been documented, caused by increased bedload and turbidity; the reduction of bank cover; and the precipitation of excess flow fluctuations; reduction of aquatic invertebrates, and accelerated eutrophication and filling of lakes. The DEIS however, entirely fails to assess the cumulative role of these factors in light of the projected development upstream on the fisheries resource. This serious deficiency must be corrected in the revised EIS. [Comment Index Number: 59, 91, 101, 113, 127, 158, 162]

Response

I-2 Fisheries habitat maintenance improvement and preservation is a high priority wildlife issue in Dillon Resource Area Management Framework Plan (USDI, BLM 1979b). Tributary streams within the Centennial Mountain complex and tributary streams that drain into the Red Rock Refuge are recognized as very important fisheries habitat with emphasis on spawning habitat for cutthroat and grayling. Fisheries population surveys and instream flow analysis have been done by BLM in cooperation with the Montana Department of Fish, Wildlife and Parks to monitor any change in this valuable resource. This monitoring effort will continue and be intensified.

No timber harvesting or road building will be done in the Centennial Mountains range that would jeopardize this valuable resource.

Comment

I-3 The DEIS fails to recognize that the Centennials provide habitat for some of the most diverse bird life in the Greater Yellowstone Ecosystem. Such diversity requires special protection, particularly in light of the vulnerability of many of these bird species to habitat disruption. However, the DEIS almost entirely fails to indicate what impacts can be expected from implementation of the management plan on various bird species. The DEIS only mentions several upland game birds and Species of Special Concern, which represent less than 5 percent of the entire bird fauna in the Centennials.

Because many of the birds of the Centennials spend part of their life cycle on the refuge and part on surrounding areas, it is imperative to evaluate the impacts of the management plan in a holistic way. Such an assessment will likely show that the cumulative effects on the avifauna of the Centennials is worse than described in piecemeal fashion in the EIS . . . These deficiencies must be corrected in the revised EIS. [Comment Index Number: 91]

Response

I-3 Maintenance of existing ecosystems is a high priority in the nongame program. The Centennial Mountain range is rich in nongame species diversity due to the diversity of habitat types within the Centennial Mountains.

Comment

I-4 In addition, Red Rock Creek provides habitat for Arctic grayling, a native fish which has been designated as a "Species of Special Concern" by the Montana Department of Fish, Wildlife and Parks. The grayling are found only in Red Rock Creek and in the Big Hole River as natives in the Continental United States. The species is critically dependent on high-quality riparian habitat and clean water for survival. [Comment Index Number: 1, 18, 50, 109, 156]

Response

I-4 The most comprehensive study of grayling was done by Perry H. Nelson (Nelson 1954). The primary problems associated with grayling spawning habitat was poor irrigation practices on the Red Rock Refuge and the problem with water right verification on tributary streams leading into the refuge.

Nelson recommended irrigation be curtailed on the refuge. Where permitted, irrigation should not begin before July 15, in order to protect the grayling spawning and fry.

No watershed problems were identified from the Nelson study on public lands (BLM). Since 1954 no watershed problems have been identified by BLM related to erosion and grayling habitat.

A program of stream monitoring on public lands include determination of changes in the quality and quantity of stream flow. Monitoring ultimately assures that watershed and aquatic resources are not adversely affected by land use changes. Information accumulated over the past 10 years indicate overall watershed conditions are improving not deteriorating.

Monitoring and fisheries surveys are done in cooperation with Montana Department of Fish, Wildlife and

Parks. Water right verification is currently being researched by the BLM and Montana Department of Fish, Wildlife and Parks.

Section J

Unstable Soils

Comment

J-1 Explain the difference between the 16,811 acres of unstable soil to be disturbed by development and the 11,297 acres of unstable soil to be disturbed by oil, gas, or logging. DEIS at 53. Estimate the public cost of remedial soil stabilization projects to achieve the intent of "Best Management Practices" to protect water quality and Lima Reservoir. Show all unstable soils on a map. [Comment Index Number: 77]

Response

J-1 The 16,811 acre figure is the total area of potential development on unstable soils, both inside and outside the wilderness area under the proposed action. This includes 5,514 acres of existing oil and gas leases inside the proposed wilderness area. A total of 11,297 acres of unstable soils, outside the proposed wilderness, may be developed.

The real cost of Best Management Practices is very difficult to determine. For example, short-term costs of relocating a timber haul road away from a stream, may be increased due to increased tractor time, increased time spent in supervision and revision of plans, and increased haul distance. In the long term, money may be saved due to decreased maintenance and increased life of downstream irrigation facilities and improved quality of fisheries. Short-term costs must be weighed against long-term benefits to determine actual costs, and many benefits are intangible.

Comment

J-2 What are the present levels of erosion and slumping? If the entire 35,303 acres are disturbed, either naturally or by human activity, impacts to habitat and water quality would be quite widespread and potentially significant. Over what period of time would this disruption be expected to occur and will these soil impacts cause violations of water quality standards. What kinds of development activities are considered when discussing these potential soil disturbances? Depending on the activity, the disturbance may be widespread or localized, short-term or long-term. This subject needs to be clarified. Also, are there any monitoring and mitigation plans proposed regarding these soil and water quality impacts? These questions should be addressed in the final EIS. [Comment Index Number: 47]

Response

J-2 Present levels of erosion and slumping have not been quantified. The levels that do exist on the 18,492 acres that would become wilderness under the proposed action approximate natural or geologic rates. With the exception of the O'dell Creek area, the only major cause of accelerated erosion rates is grazing and past mining activity.

If the entire 35,303 acres of unstable soils were disturbed, there would be an immediate and drastic increase in sedimentation rates. There is little doubt that water quality standards would be exceeded. Realistically, this kind of disturbance could only be expected in the case of a catastrophic wildfire. A worst case development scenario would involve extensive logging or development of an oil field. Either of these would disturb only a percentage of the total surface area and Best Management Practices would greatly reduce the impacts.

In the case of wildfire that covered the entire area, aerial seeding and sediment control structures would greatly reduce sediment production within three to four years, but natural levels of sediment production would probably not be approximated for about ten to fifteen years. Wilderness status would not affect post fire rehabilitation efforts.

Monitoring studies are in place to monitor changes in vegetation due to grazing. There is also a study in place to monitor the effects of clear cutting on slumpy soil. Mitigating measures are an integral part of all development plans. There are no existing plans for watershed improvement projects.

Comment

J-3 The DEIS does not adequately address protecting the water quality essential for survival of trout, arctic grayling, trumpeter swans and other waterfowl. Levels of erosion and slumping increasing on 23 percent of the study area when development activities occur should not be an acceptable alternative . . . Please revise the DEIS to include more detailed analysis of soil erosion and water quality. [Comment Index Number: 127]

Response

J-3 A detailed analysis of soil erosion and water quality is beyond the scope of the EIS. Appendix E displays soil characteristics of the major groupings of soils in the study area. Present erosion condition for portions of the study area may be found in allotment management plans, compartment management plans, monitoring study files, and other planning documents located at the BLM Dillon Resource Area and Forest Service Ranger District offices.

The potential levels of soil slumping and erosion given for each alternative with development are a worst case situation. Any development proposal on unstable or erosive soils would have extensive mitigating stipulations applied. These would be aimed at reducing or eliminating impacts of the development action.

Comment

J-4 Continuation of the refuge's vital role as preserver of the trumpeter swan, as well as other waterfowl and wildlife indigenous to the area, depends upon its ability to maintain quality watershed for the refuge. The fact that the soils underlying the Centennial Mountains are highly erosive and siltation is already a problem on the refuge needs to be realistically evaluated before allowing development such as logging, mining, and road building. [Comment Index Number: 166]

Response

J-4 All projects on public lands are evaluated for impacts to resource values. Each proposal for development is reviewed by a soil scientist and hydrologist and recommendations are made on measures to reduce or eliminate soil erosion and water quality problems. These "Best Management Practices" are listed in Appendix L of the draft EIS.

Comment

J-5 This concerns the Lima Reservoir which is very critical for the water supply of the ranchers for their irrigation of hay ground and other crops. Therefore . . . what is more important to our economy than the area agricultural community which is a lot more important than the 200 million feet or so of timber that would be logged in the Centennials each year. The silt, etc., from logging operations could have a drastic effect on the water table of the reservoir especially in a dry year like this year. Any slowing down of the water moving through Red Rocks Lakes could have quite an effect on how fast the reservoir would fill in a dry year like this. [Comment Index Number: 50, 86, 89]

Response

J-5 All proposed logging operations on public lands are reviewed by a soil scientist and/or hydrologist. Mitigation of impacts is accomplished by application of Best Management Practices. These practices are listed in Appendix L.

Sediment levels in Lima Reservoir are more dependent upon grazing practices along the Red Rock River and lake shore conditions than development in the Centennial Mountains. The variability of the lake level due to irrigation demands and highly erosive soils causes the banks to be very unstable.

It is common for banks to be 15 to 20 feet high and nearly vertical. Tons of sediment are deposited in Lima Reservoir annually due to wave action eroding these high banks.

Comment

J-6 What are the sources of the excess sediments, nitrogen, phosphorous, and coliform mentioned on page 33? What steps are being taken to correct each problem? [Comment Index Number: 47, 77, 91]

Response

J-6 This information came from a baseline inventory performed by the State of Montana, Water Quality Bureau in 1978-79. The sampling point was on the Red Rock River (T. 14 S., R. 4 W., Sec. 6, CDD). For the station on O'Dell Creek (Sec. 31) there was one reading of 35 mg/l on a spring runoff sediment sample, the other three sediment readings for that year were 6 (June), 0 (July), 3 (Aug. 21), and 4 (Aug 29). These readings correspond with Montagne's (1987) observations that much of the "sediment is apparently detached from the banks by the fast-flowing spring snowmelt waters."

Baseline inventories give a general picture of the watershed above the sampling point. Extrapolating the data to a point in the watershed is not scientifically defendable. To identify the specific source of excess sediments; nitrogen, phosphorous, and coliforms; is possible but not practical because of the large amount of sampling and monitoring that is required to pinpoint a specific source. Montagne identified natural geologic erosion, grazing-induced erosion, streambank erosion (along the major streams as they meander through the Centennial Valley just prior to discharging into the lakes) and erosion resulting from road cuts associated with phosphate mining as the major sources of excess sediment.

Proper grazing management of riparian areas adjacent to streams can correct much of the streambank erosion Montagne has identified. The Best Management Practices (Appendix L), if practiced and enforced, can alleviate most of the water quality problems associated with road building, timber harvests, and mining.

Comment

J-7 One other thing I think was already mentioned earlier is that we'd like to see included in there the effects that will be caused to the mountain lakes on the drinking, and we're using the Challis Forest already issuing warnings not to drink the water because of inadequate facilities there. [Comment Index Number: 39]

Response

J-7 The quality of drinking water is affected more by wildlife than by any developmental activities that the BLM is considering in the Centennials. The case in point is Giardia and its prevalence in the wilds of Montana.

The BLM policy is not to sign potable or unpotable water in areas outside developed campgrounds.

Comment

J-8 In many cases, statements made in the introductory summaries of the alternatives on pages i to iv are not carried through in the supposedly more detailed Environmental Consequences. For example, in Alternative 1, page ii, it states that erosion and slumping may increase on 48 percent of the unstable soil, and another statement is that 15 percent of the drainage may be developed and affect trumpeter swan and fisheries habitats. There is no readily apparent connection between these statements and those that appear in the Environmental Consequences — Chapter 4 for Alternative 1. No where is it mentioned in Chapter 4 that trumpeter swan habitat could be adversely impacted. No where does it explain why increased slumping on 48 percent of the unstable soils will not impact water quality. [Comment Index Number: 56]

Response

J-8 The 48 percent of unstable soils within the study area mentioned under Alternative 1, past ii is the 16,811 acres listed under Effects on Unstable Soils, page 53 of the Draft EIS. This is the acreage of unstable soils, both inside and outside the proposed wilderness, that would be available for development under Alternative 1.

The 15 percent of unstable soils within the study area mentioned under Alternative 1, page ii is the 11,297 acres listed under Effects on Unstable Soils, page 53 of the Draft EIS. This is the portion of the study area outside the proposed wilderness area that would be available for development, and be on unstable soils under Alternative 1.

Section K

Timber Harvest

Comment

K-1 The draft EIS states that even without wilderness designation, no timber harvest will occur on the wilderness study lands within the Targhee National Forest. That's on page 11. And the reader is referred to the Targhee National Forest Land Use Plan Appendix C for a detailed description of how these lands would be managed if they are not classified as wilderness. Appendix C, however, shows that although no timber harvest is proposed in this decade, the future looks very different in succeeding decades. If these lands are not designated as wilderness, the fourth plan goes on to show that "proposed and probable practices" would involve the harvest of 2.5 million board feet of timber per year starting in 1991—this is 4 years away—to the year 2000, 1.6 million board feet per year in the years 2001 to 2010, and 3.5 million board feet per year in the years 2011 to 2020. To what can we attribute the incredible discrepancy between a draft EIS, which says no timber harvest is planned and a forest plan which shows a proposed and probable harvest of some 76 million board feet of timber for the same area over the 30 years beginning in 1991. [Comment Index Number: 27, 32, 70]

Response

K-1 There are no plans to harvest timber from the Targhee portion of the Centennials after 1990. Current direction in the Targhee National Forest Land Management Plan precludes timber harvest in Management Area 5. Thus, timber harvest will not occur unless the direction in the plan is changed. Such a change would require a revision to the plan and would likely require an environmental impact statement. Targhee officials have no plans to allow timber harvest in Management Area 5 and none is contemplated for the future. There are outputs shown for timber harvest in Management Area 5 for 1991 and beyond, but they represent potential yield only and are not a commitment to harvest.

Timber on the Targhee National Forest is not extensive and stands are scattered and patchy. Much of the area was designated as "not suited for timber production" in the Targhee Forest Plan. In addition, the timber in Management Area 5, the area included in the wilderness study, is needed to provide cover for elk, because of timber harvest and other activities occurring in the more productive timber stands in adjacent areas. These conditions will not change during the 1990s. Thus, no timber harvest is planned in the Targhee portion of the study area.

Comment

K-2 The USFS Targhee National Forest Final Land Management Plan identified very little timber value or forested land in this Centennial Mountains Management area. We submit this conclusion is incorrect. The Centennial Mountains Management Area has many forested areas which are of interest to this association and Idaho's timber industry. Our interests and input for full multiple use designation result from our deep concerns in many areas. The following lists some of these:

1. The loss of any potential future timber base which results from any forested lands within the Centennial Mountains management area.

2. The spill over affect of a wilderness designation, management and/or classification on the full multiple use and future timber supply potential of the 127,700 acre USFS Targhee National Forest Sheridan Land Management Area will be severe. It is submitted that because the southern border of the Centennial Mountains Management Area is a mid-slope border, as well as the northern border of the Sheridan Management Area, that any wilderness designation management, and/or classification of the Centennial Mountains Management Area will result in some defacto wilderness designation and/or serious restrictions on the future timber supply potential of the Sheridan Management Area. It is submitted that some of these reasons are: Inability to build adequate and/or economical roads and other timber access developments; inability to adequately management a mid slope border without either very high costs and budget demands, or very conservative timber management of the Sheridan Area near the border which will result in timber management and/or timber harvesting related costs which are above normal, or both; preservationists' demands, lawsuits, and other environmental concerns for the wilderness management of every acre of land designated or classified in a wilderness area can be expected to cause increased USFS management costs, and conservatism of all border areas; the cancerous type growth of wilderness designated lands into the Sheridan Area, which remain unroaded in future planning periods, must be recognized.

Response

K-2 The Sheridan and Centennials Management Areas were separated because they have some very distinct differences—largely a result of elevation. The Sheridan area contains more extensive stands of timber, and timber harvest is an important management activity. Timber in the Centennials is scattered and is especially important for elk cover because of the timber harvest that is occurring in the Sheridan Management Area. This situation will continue into future decades where timber harvest will likely continue in the Sheridan Management Area, and timber in the Centennials will be retained for elk cover.

Lands adjacent to wilderness often receive extra scrutiny by managers and the public when management actions are proposed. Actions in these areas are often the subject of appeals and lawsuits. Although this often results in additional cost, there have been no attempts to quantify what additional costs would be. Regardless, since the portion of the Targhee is recommended for nonwilderness management, the spillover effect onto the Sheridan Management Area will not materialize.

Comment

K-3 Mitigation of degradation of logging, roading, and other intrusion is inadequately addressed; economic analysis do not appropriately include the true costs of multiple abuse of my public land in the Centennials. [Comment Index Number: 128]

Response

K-3 The analysis has attempted to evaluate all uses based on the best information available. In the evaluation of logging, proposed yield figures reflect reductions for environmental concerns such as wildlife habitats and watershed protection. It is these timber volumes which are then measured against other uses. Measurable economic values tend to change quickly with fluctuations in the economy. Wilderness values for example are very difficult to measure. For these reasons, public opinion is solicited.

Comment

K-4 Page 125. 2nd column, Paragraph 2. The sentence in that paragraph which relates to an 85-year rotation for determining a yield per acre of timber is questionable. The short time span for rotation is surprising considering BLM clearcuts harvested in the 60's in the Centennials above the 7L Ranch have not properly regenerated more than 20 years later. [Comment Index Number: 50]

Response

K-4 The 85-year rotation is taken as an average of rotations for several species. Douglas-fir, for example, has a longer rotation than lodgepole pine. Some of the older clearcuts have regenerated at an undesirable rate. Others have done very well. The science of tree culture has come a long way since the 1960s. Rodent control, protection from grazing, improved physiological condition of seedlings, and site preparation are some of the tools a forester uses to shorten restocking periods. If sufficient restocking does not occur within 15 years, then sites will be replanted.

Comment

K-5 The DEIS cites the fact that no management activities are planned in the area as a reason for not recommending it wilderness (pg. 11). This seemed inconsistent with the Land Management Plan for the Targhee which identifies some 9.2 mmbf of timber as being suitable for harvest from 1991 on. A letter from Forest Supervisor John Burns (copy attached) states that the LMP allocates the area to non-development, i.e. no programmed or unprogrammed timber harvest, and that the suitable timber is for information purposes only.

Mr. Burns' assurances do not jibe with the Land Management Plan for the Targhee. The LMP at page 169 states: "Timber will only be harvested from available, capable, and suitable forest lands with the following exceptions:

. . . 2. As environmental assessment indicates stand conditions, insects, or pathogens pose an unacceptable threat to adjacent stands or wildlife habitat."

At page 176 of the LMP states: "In any locality where an environmental assessment indicates stand mortality, conditions, insect or pathogens are such as to cause the stand to be of low utilization for wildlife, or in which insects or pathogens pose a significant threat to adjacent stands, reproduction, understory, or future growth and wildlife potential, the Regional Forester may approve deviation from the standards and guidelines in Forest-wide or management area direction in order to cope with the situation."

"In the event of a catastrophic occurrence such as fire, blowdown, inspect epidemic, . . . or the reasonable expectation of such an occurrence, the Regional Forester may approve deviations from the standards and guidelines . . ."

These two sets of quotes illustrate that the Targhee Forest has no intention of letting natural processes occur on the Forest. Any of several types of activities may result in exceptions to the Plan. There is no assurance that the Centennials will not be timbered for any of a multiple of natural occurrences.

The LMP calls for a tripling of Douglas Fir harvest between 1991 and 2000 (LMP, page 170). In order to meet these volumes, it seems almost certain that the Targhee will have to enter the Centennials sometime after 1991.

The assertions in the DEIS concerning the future of the Centennials are incorrect. The DEIS must be redone to reflect a strong likelihood that timber will be harvested on the Targhee side and display the consequences.

Nowhere in the DEIS can one find any reason for choosing one Alternative over another. The consequences, as far as the DEIS goes, for each alternative are displayed. But no analysis is done to document why one Alternative is better than another. It is left to the reader to gather by implication what is the rationale for the Preferred Alternative. This is clearly inadequate. The DEIS must display not only the consequences of each alternative but the reasons for choosing one over the other. [Comment Index Number: 87]

Response

K-5 There are no plans by the Targhee to conduct timber harvest in the Study Area. Direction in the Forest Plan precludes timber harvest or other development activities unless the Land Management Plan is revised or amended to provide for those activities. Such a change to the Plan would require an environmental assessment or environmental impact statement. In either case, extensive public involvement would also be required. Timber outputs shown in the Targhee Plan for 1990 and beyond represents potential yield only and are not a commitment to harvest. This point is made very clear in several places in the EIS for the Targhee Forest Plan.

The presence of direction allowing timber harvest in response to catastrophic occurrences on lands classified as not suited for timber production should not be construed as evidence that timber harvest is planned. Such activities would be the exception and would occur only after a thorough environmental assessment and public involvement.

It should be noted that similar provisions for response to catastrophic occurrences are also provided in the Wilderness Act.

Section L

Grazing Use

Comment

L-1 Chapter 4, Effects on Range Resource—all alternatives: The desirability of increasing or maintaining current levels of livestock grazing in the Centennial Mountains is questionable. On page 33 it states that highly erodible soils compounded by historic overgrazing have increased turbidity levels. Water quality in Red Rock River has deteriorated to the point that aquatic life and recreational uses are suffering. Other drainages are also suffering water quality deterioration from previous management policies on grazing, logging, and roading. One of the major benefits of wilderness designation under all alternatives is the benefit to water quality from the elimination of logging and the maintaining of grazing at low levels. This must be mentioned in the analysis. [Comment Index Number: 56]

Response

L-1 Water quality impacts on the Red Rock River above Odell Creek are related to past activities. BLM lands are unleased for livestock grazing and very little additional timber is available for harvest outside those areas already logged. Attempts are being made to reclaim or stabilize those areas disturbed by mining. Below Odell Creek where past and present management activities are affecting water quality, most tributaries to the Red Rock River are dewatered for irrigation purposes well before entering the river. Sedimentation in the Red Rock River drain lower drainages is more a result of management actions on intervening private lands.

Water quality problems in the tributaries can be partially attributed to livestock grazing. However development of grazing strategies which maximize residual vegetation left in riparian areas, minimizing duration of use, or changing seasons of use can be more effective in reducing adverse water quality impacts than reducing stocking rates.

Comment

L-2 Montagne also recommends developing a monitoring program to more accurately assess the impacts of grazing on erosion and mass failures, and on streambank stability. The findings of such an effort could be useful in adjusting management directions for grazing. The DEIS should be revised to adopt these recommendations . . .

The DEIS fails to reduce the grazing levels or to monitor the effects of livestock on other uses of the CMWSA. In fact, the DEIS plans to increase grazing by 13 percent on the 46,637 acres not recommended for wilderness. This increase can be expected to exacerbate impacts on other resources, particularly fisheries and waterfowl.

The DEIS must be revised to correct these inadequacies and to reduce livestock grazing to the level at which protection of wildlife and fisheries can be assured. [Comment Index Number: 91]

Response

L-2 BLM is currently doing some monitoring of erosion problems. Though there are grazing management problems in the Centennials there is no evidence that it is a function of too much livestock though it may be a problem of season and timing of grazing. Whether the area is designated wilderness or not, the improving and refining of grazing programs will continue.

Comment

L-3 P. 52, Effects on Range Resource, conclusions, paragraph 1: This section states, "there would be no significant impact on permittees use of vehicles because primitive means of transportation are used for livestock grazing management." This is inconsistent with the discussion on the use of motorized vehicles and potential impacts as described on page 57, Column 1, paragraphs 1 and 4 . . .

These elements are not discussed in a consistent enough manner in each alternative to allow comparison of the relative economic values or impacts between alternatives, i.e., Alternative 1 states that current vehicle use is already primitive while Alternative 2 alludes to more extensive use of motorized vehicles. The effects of the geographic boundary differences between alternatives and their relationship to livestock management areas are unclear. Discussion of economic considerations fail to document the importance if any of these increased AUM's or the severity of the consequences of vehicle restriction to existing local livestock producers. [Comment Index Number: 47]

Response

L-3 The only areas in the study area that have their current method of operation changed is in the west end of the area, (primarily the Peet Creek allotment). In all the allotments east of the Peet Creek allotment, the permittees do most of their livestock work by horse back or with a very minimum amount of vehicle use. Increases in cost operation would be minor for each permittee (at the most up to $1,000 per year operating cost to the major permittees could be anticipated). Regardless of designating the area wilderness or not the BLM and permittees will be working on improving management and resource values. There is not a lot of difference to the resource livestock industry in Montana when comparing each of the alternatives.

Comment

L-4 Identify each grazing permittee, the size of each allotment, the number of AUMs on each, the range condition, the riparian condition, and the trends. On a map, indicate the location of each allotment. For each allotment, identify the ratio of AUMs allotted to livestock and to wildlife. [Comment Index Number: 77]

Response

L-4 Publishing permittees names in a public document of this nature is not standard procedure. However agency files, the Mountain Foothills Impact Statement (USDI, BLM 1980) and the Dillon Resource Area Management Framework Plan (USDI, BLM, 1979b) contain this information and are available for inspection during normal operating hours.

Provisions for wildlife habitat improvement and some forage allocations were made to elk in the Dillon Resource Area Management Framework plan, but specific allocations to all species were not made. Many wildlife foraging areas are not well delineated in the forage inventory surveys that were done for the Mountain Foothills Impact statement. Calculating the ratio of AUMs allocated to wildlife as opposed to livestock is not possible with the existing level of information.

Comment

L-5 Why do you propose to prohibit motor vehicle use in building the 1/2-mile Price Peek fence? Why do you propose to build the Price-Peet fence? [Comment Index Number: 77]

Response

L-5 The Price Peet fence would be built to provide for more effective management that will meet resource needs. For the most part this would be to improve herbaceous cover on erosive soils, manage for better control of forage for elk that will stage in the area, and to relieve some pressure on some riparian communities. Limited vehicle use to haul construction materials to a central location would be allowed for the construction of the Price-Peet Fence.

Comment

L-6 We'd also like to see included in here the effects that this would have on the noxious weed program. Under the noxious weed program you go in and spray where those would be affected. We recommend you contact your county officials who are responsible for that and include that as the effect it's going to have on it. [Comment Index Number: 39]

Response

L-6 Noxious weeds are not currently a problem in the Montana BLM portion of the proposed wilderness, however the BLM is constantly working with the county and other agencies to try and head off a noxious weed problem before it gets started.

Section M

Economic Issues

Comment

M-1 In the chart showing the economic loss or benefit from different management schemes, it shows a potential net gain of 22 jobs related to timber harvest under a no wilderness alternative. This is somewhat misleading for several reasons. First, it assumes that timber harvest of all available commercial stands would take place, which given the highly erodible soils, the impact on elk herds, and endangered species like grizzly bear, is somewhat questionable at best. [Comment Index Number: 189]

Response

M-1 Timber harvest would be limited to 13,200 acres of a total of 72,885 acres contained in the study area. Table 3-5 in the draft EIS indicates that these 13,200 acres are suitable for harvest.

Comment

M-2 For example, considering that 300-500 elk utilize this area for fall and early winter migration and staging grounds, and many hunters willingly pay hundreds, and at times, thousands, of dollars to shoot an elk, this represents a yearly worth of this habitat of hundreds of thousands of dollars. Your figures on the value of elk hunting seem grossly underrated but, at best only represent the value of elk in terms of potential employment . . .

How much is the potential loss of elk habitat alone worth, much less the impact on other resources such as fisheries, etc? I would say when all factors are considered including recreation, elk habitat, fisheries, plus the costs of trying to mitigate these impacts if timber harvest were developed versus leaving the area alone, the real costs of timber harvest would be found to be outrageously high when compared to the supposed economic benefits it would create. Is this being represented in your economic charts? [Comment Index Number: 189]

Response

M-2 No figure was presented in the draft EIS on the value of entering federal lands to hunt elk. The annual income in the draft EIS for elk hunting represents the income placedin the local economy by typical expenditures of elk hunters.

It is difficult to estimate impacts created by timber harvest until a specific timber sale is designed. As indicated in Table 3-5, p. 39 of the draft EIS, timber harvest operations proposed under any alternative would be confined to suitable lands where soil and water damage would be mitigated by Best Management Practices. Initial scoping of public interest indicated support for an economic analysis which considered impacts on jobs and income rather than economic efficiency. An economic efficiency analysis may be included in the environmental assessment for specific timber sales and may consider recreation, elk habitat, fisheries values, and mitigation costs. Economic efficiency analysis examines and compares the dollar benefits and dollar costs of a specific project through time.

There are no plans to harvest timber from the Targhee National Forest portion of the area covered by the draft EIS. Current direction in the Targhee National Forest Land Management Plan precludes timber harvest in Management Area 5. Thus, timber harvest will not occur unless the direction in the plans is changed. Such a change would require a revision to the plan and would likely require an additional environmental impact statement. Targhee officials have no plans to allow timber harvest in Management Area 5 and none is contemplated for the future. Therefore an economic analysis of timber harvest on the Targhee National Forest portion of the area covered by the draft EIS is not necessary.

Comment

M-3 But it doesn't look like timber will offer much of an economic future, if it depends on the five inch dbh stuff mentioned in the DEIS. It seems that, in proposing to subject this skimpy timber to harvest, you could end up causing more harm than the limited good could offset. Assistant Secretary Doug McCleery once said that dependency on marginal timber can threaten community stability. The final EIS should give a much more explicit accounting of this trade-off, specifically as related to such skimpy timber. On such acreage, you might as well go ahead and recommend wilderness designation. [Comment Index Number: 85, 146]

Response

M-3 Information discussed on p. 39 of the draft EIS indicates that mature predominately Douglas-fir sawtimber stands occupy about 80 percent of the suitable forest land. This would suggest high value timber.

Comment

M-4 The logging you mention proposed on 13,200 acres is strictly a subsidy operation. The growth (about 30, cu. ft./acre/year) is the lowest category for commercial timber (20-50 CF).

Studies by the National Wilderness Association, Natural Resource Defense Council, and the General Accounting Office (GAO) provide conclusive evidence that the Beaverhead and Targhee Forests must spend $100 to recover $6 to $50/Mbf on timber sales. These forests are adjacent to BLM lands; the likelihood is BLM timber is worth less. The figure on P. 61 of the Centennial Mountains Wilderness Study shows BLM will obtain $520,344 annually on a sale of 2.6 MMbf, or about $200/Mbf.

This must be a mistake. West Coast timber sells for $200—$300 Mbf. The GAO shows that Region 4 of the Forest Service recovered an average of $17.90/Mbf for 1981 and 1982. This price also includes credits for road construction and KV (timber stand improvement). So the actual return to the treasury is the minimum of $5.00 to $6.00/Mbf. For comparison, the expense on eastside forests in Region 1 approaches $100/Mbf. Consequently I would estimate BLM timber would lose about $80—$95/Mbf. [Comment Index Number: 163]

Response

M-4 The general statement that the Beaverhead and Targhee Forests must spend $100 to recover $6 to $50/mbf on timber sales is not appropriate. On the Targhee, in gently terrain, revenues from timber sales may exceed costs.

The figure referenced on p. 61 of the draft EIS is not an estimate of the revenue generated to BLM by sale of the timber. This figure represents an estimate of the income that will be generated to the local economy by harvest and processing of this timber in the local area. This income includes salaries, wages, profit, rents, royalties, interest, etc. This income includes direct income which is generated by the sale of lumber by the sawmill to final consumers. Also included is indirect income which is generated by other industries selling their outputs to the sawmill or logger to process timber. An example would be income generated by sale of diesel fuel to truck the logs from federal lands to the sawmill. Also included is induced income which is generated by expenditures of employees and owners of industries which generate direct and indirect income. An example would be purchase of groceries in the local market by an employee of the sawmill.

There are no plans to harvest timber from the Targhee National Forest portion of the area covered by the draft EIS. Current direction in the Targhee National Forest Land Management Plan precludes timber harvest in Management Area 5. Thus, timber harvest will not occur unless the direction in the plans is changed. Such a change would require a revision to the plan and would likely require an additional environmental impact statement. Targhee officials have no plans to allow timber harvest in Management Area 5 and none is contemplated for the future. Therefore an economic analysis of timber harvest on the Targhee National Forest portion of the area covered by the draft EIS is not necessary.

Comment

M-5 The Draft correctly describes damage to the wildlife and recreation resources induced by logging. The economic analysis does not deduct the cost of these damages from the supposed benefits.

Any land allocation decision for public lands must demonstrate a net public benefit for the long term. **All** projected costs must be analyzed as thoroughly as benefits.

The absence of such analysis is a very serious deficiency. Please supply such analysis as a supplement to the draft. Public involvement in such an analysis will be essential. [Comment Index Number: 79]

Response

M-5 It is difficult to estimate the cost of resource damage, if any, created by logging until a specific sale is designed. As indicated in Table 3-5, p. 39 of the draft EIS, logging operations proposed under any alternative would be confined to suitable lands where levels of soil and water damage would be acceptable. Initial scoping of public interest indicated support for an economic analysis which considered the effect on jobs and income rather than economic efficiency. Economic efficiency analysis can be included in the Environmental Assessment documents as they are developed for specific projects.

There are no plans to harvest timber from the Targhee National Forest portion of the area covered by the draft EIS. Current direction in the Targhee National Forest Land Management Plan precludes timber harvest in Management Area 5. Thus, timber harvest will not occur unless the direction in the plans is changed. Such a change would require a revision to the plan and would likely require an additional environmental impact statement. Targhee officials have no plans to allow timber harvest in Management Area 5 and none is contemplated for the future. Therefore an economic analysis of timber harvest on the Targhee National Forest portion of the area covered by the draft EIS is not necessary.

Comment

M-6 Mitigation of degradation of logging, roading, and other intrusion is inadequately addressed; economic analyses do not appropriately include the true costs of multiple abuse of my public land in the Centennials. [Comment Index Number: 128]

Response

M-6 Economic efficiency analysis can be included in the environmental assessment for specific projects (See also Response M-5).

Comment

M-7 The economic analysis . . . is misleading because each alternative has this table "Economic Impacts of Alternative" and it is a nice big table and if you are used to just glancing at numbers, you will see all these big dollar signs . . . The caveats that go with this table are buried back on page 72 in the statement that Ms. Magley just quoted and in the little footnote that says that employment figures are employment potential; no guarantee that this level of employment will occur. And I would like a little more up-front presentation of that kind of data . . .

That data is all potential. You won't realize those 22 timber jobs if you don't get budgets to maintain the below-cost sales that are likely to be occurring down there. You won't get the 375 extra AUMs unless you have the budget to put in those range improvements . . .

The economic analysis has been done on too narrow a scope. It is just looking at the Centennials and it ignores other factors. [Comment Index Number: 6]

Response

M-7 Footnote 2 from Table 4-24 of the draft EIS will be placed on all tables in the final EIS where income and employment figures are displayed.

Comment

M-8 The 8.49 jobs per mmbf figure they used out of Implan. That's an old figure. You know, all the trends now are for that figure going down. In other words, as we switch to more mechanized timber harvest practices necessitated by smaller logs, we get much more mmbf per person, so that put it the other way, many fewer people per mmbf, and I would like to see that figure updated and account for trends into the future. That's real pole country down there. You have some big spruce and Doug fir, but a lot of that stuff is lodge pole and you should update that figure, the Implan figure. [Comment Index Number: 6]

Response

M-8 The ration of 8.5 jobs per mmbf was developed in 1977 for the basic data for the Forest Service IMPLAN computer model. We are unaware of any technological advance in the timber industry that would dramatically reduce this ratio.

Comment

M-9 What I would like to see happen is extend the economic-type analysis to be more like what the Forest Service does with their present net value calculations; that is, check your timber employment rates; factor in timber sales costs, or discuss timber sales costs here; look at the agency budget issue because that is going to determine whether you will see any benefits from some of these commodity programs; re-look at your wilderness use projections and then put all that together and try and come up with some kind of present net value ranking on these alternatives. And I suspect the all wilderness alternative would come out highest in that.

And then take the step further . . . if you were to expand that economic impact table to include all of the factors and come up with something equivalent to present net value and then look at the other, the non-priced benefits that go into net public benefit, such as aesthetics and wildness and water quality and natural diversity and things like that, I think far and away net public benefit would be maximized with an all wilderness alternative. [Comment Index Number: 6]

Response

M-9 The net present value economic analysis was not undertaken for this draft EIS since specific projects and timber sales are not yet planned. As the projects are developed for the selected alternative, net present value or economic efficiency analysis can be included in the environmental assessment documents prepared for these projects. Economic values for non-priced benefits such as natural diversity are difficult to determine, but may be included in the environmental assessment documents for specific projects.

Comment

M-10 The economic analysis in the study is deficient for several reasons.

1. The analysis in too parochial—only local factors are considered.

2. The analysis does not evaluate the probability that potential employment and income levels under each alternative will be realized. (e.g. due to regional and national factors, it may be impossible to realize 22 timber-related jobs under Alternative 3).

3. There is no data that places the economic contributions under the various alternatives into perspective with the area-wide economy.

4. The Implan figure of 8.49 jobs per mmbf should be re-evaluated in light of current trends toward increased mechanization in logging and milling and recent increases in productivity (mmbf/job).

5. The economics of timber sales in the area are not discussed. Since sales on the adjacent national forests are typically "below cost," the likelihood of a continuing national subsidy for timber program in the Centennials, given the current budget crunch, should also be discussed. [Comment Index Number: 82]

Response

M-10 1. The economic analysis was intended to cover the five-county economy most heavily influenced by actions in the Centennials. Similar economic analysis are available in the Environmental Impact Statements of the Targhee and Beaverhead National Forest Plans which cover larger areas of southern Montana and southern Idaho.

2. Other alternatives display economic impacts for different levels of timber employment. For example, Alternative 1, table 4-3, p. 54 of the draft EIS displays the economic impact of five timber jobs. Alternative 7, table 4-20, p. 69 of the draft EIS displays the economic impact of 20 timber jobs.

3. On page 41 of the draft EIS is a discussion of the economic contributions of the Centennial Mountains area to the economy of the surrounding region.

4. The Targhee Forest is unaware of any technological advance that would dramatically reduce this ratio.

5. An economic efficiency analysis could be placed in the environmental assessment documents for individual timber sales. As indicated on p. 59 of the draft EIS, mature Douglas-fir timber stands occupy about 80 percent of the suitable forest land. In gentle terrain, revenues may exceed costs on the sale of this higher value timber.

Comment

M-11 Page 30 and 56 contain statements that wilderness designation would increase use initially, but such increase would quickly return to predesignation levels. These statements are unsubstantiated by the facts presented in the EIS, and are merely opinion at this point. For example the data presented on page 30 indicates a 25 percent increase in use of the newly designated Red Rock Lakes National Wildlife Refuge Wilderness from 1981 to 1983. This is a **signigicant** increase in visitor use.

The EIS goes on to analyze the regional demand far wilderness on page 42. Here it states that "growth in population will have a major impact on demand for wilderness. The Centennial Mountains are located in the fast growing northwest region, so increases in demand for all resources available on federal land including wilderness recreation can be expected." This statement certainly counters the statements made on pages 30 and 56 that use will quickly return to predesignation levels. On the contrary it is extremely likely that wilderness designation will result in significant long-term increase in visitor use of the area. This has important ramifications for the economic analysis of the various alternatives. [Comment Index Number: 56]

Response

M-11 Another factor besides population growth, which influences demand for wilderness, is substitution. Designated wilderness in the Centennials must compete for visitors with other similar areas located within comparable distances of major cities. As displayed in table 3-8, p. 42 of the draft EIS the three major cities in the region already have 9,645,552 acres of statutory wilderness within a five hour travel time. Also noted on p. 42 of the draft EIS is the fact that the region already has 15,179,243 acres in 177 areas either designated wilderness or with the potential of designation. With this many competing areas for the wilderness experience, it is difficult to project the increased amount of visitor use that wilderness designation would generate in the Centennials, and the impact that the increased amount of visitor use, if any, would have on the local economy.

Comment

M-12 This EIS does not give an adequate evaluation of the economic contribution that wilderness designation would bring to the local and regional economy in terms of increasing visitor use of the Centennials.

Nor does it give an adequate picture of the trade-offs involved. For example on page 56 it states that 596 recreation visitor days of snowmobile use would be lost, yet no mention is made of the important contribution to recreation visitor days that may be created by wilderness designation. The issue of what positive impacts to the local economies might be realized with wilderness designation and to what degree would they offset other loss of income (Appendix A Page 83) has not been adequately analyzed.

Page 54: The validity of the IMPLAN model as used in the analysis is questionable. It is well known and documented that recreation creates many indirect economic benefits derived from guide services, lodging, food service, gas and related supplies. Income from these sources is not accounted for. The Appendix should contain a brief summary of the **IMPLAN** Model assumptions and the data (or summary of data) input into the model. The figures in Tables 4-3 through 4-8 have little meaning because it is impossible to know how they were derived or to determine their validity. [Comment Index Number: 56]

Response

M-12 An input-output computer model (IMPLAN) was used to estimate the employment and income impacts of outputs and activities proposed under each alternative. Direct, indirect, and induced employment and income are estimated by this model. The sum of direct, indirect, and induced employment and income is total employment and income. Total income and employment are displayed in the tables in the draft EIS.

Input-output analysis is a procedure for describing the structural interdependence of a regional economy or impact area and serves as a short-term predictive model for evaluating the impacts of shifts in outputs and activities on federal lands covered by the draft EIS.

Input-output analysis is based upon the interdependence of production and consumption sectors in the impact area. Industries must purchase inputs from other industries, as well as primary sources like natural resources, for use in the production of outputs which are sold either to other industries or to final consumers.

An additional requirement of input-output analysis is the selection of a local impact area that will be effected economically by activities and outputs on the lands under consideration. For the lands covered by the draft EIS, the impact area was assumed to be Clark, Fremont, and Madison Counties in Idaho and Beaverhead and Madison Counties in Montana.

The input-output model translates outputs and activities into employment and income impacts. An intermediate step is the translation of outputs into final demand expenditures. Final demand expenditures represent the dollars spent by the final consumers of the finished products derived from forest outputs. For instance, timber is processed into lumber which has a sale value at the mill. The sale value represents the amount of new money that will be directly generated for the local impact area, assuming that most is sold outside the impact area, this causes the local economic impact.

This modeling step is accomplished by applying a final demand expenditure per unit of output to total outputs and linking the resulting dollar amount to the sectors in which the final demand expenditure takes place. This process determines the change that is projected to take place in the existing economy. The assumptions and data input into the IMPLAN model are available at the Targhee National Forest Supervisor's Office in St. Anthony, Idaho.

Comment

M-13 We also feel that the difference in economic activity and employment between Alternatives 1 and 2 cannot be a factor. The figures given in the study illustrate that opening more of the area for development does virtually nothing to relieve any current economic problems in the area. [Comment Index Number: 81]

Response

M-13 There is a distinct difference between Alternative 1 and 2. For example, employment under Alternative 1 is projected to be 20 jobs (p. 54), while employment under Alternative 2 is projected to be 7 jobs (p. 58 of the draft EIS).

Comment

M-14 It appears that the draft EIS only uses jobs created as a measure of economic impacts. There are other economic impacts that could be included. For example, in alternatives 1, 3, 4, 7, and 8 under the discussions on unstable soils, mention is made that irrigation storage will be lost in Lima Reservoir due to siltation. There is an economic value to the storage in Lima Reservoir. It is also possible that damage to wildlife habitat on and off Red Rocks Lakes National Wildlife Refuge would lead to projects to re-establish habitat. It generally is very expensive to re-establish habitat and this would be a direct economic cost that could be partially attributed to management of the watershed within the study area. Inclusion of these items would make the economic impacts of Alternative 5 similar to Alternatives 1 and 3. [Comment Index Number: 175]

Response

M-14 The loss of irrigation storage, damage to wildlife habitat, re-establishment of wildlife habitat are probably best analyzed in a cost benefit or economic efficiency analysis. Initial scoping of public interest indicated support for an economic analysis which considered the effect on jobs and income rather than economic efficiency analysis. An economic efficiency analysis would consider the dollar benefits and dollar costs of a specific project through time. Economic efficiency analysis may be included in the environmental assessment for specific projects.

There are no plans to harvest timber from the Targhee National Forest portion of the area covered by the draft EIS. Current direction in the Targhee National Forest Land Management Plan precludes timber harvest in Management Area 5. Thus, timber harvest will not occur unless the direction in the plan is changed. Such a change would require a revision to the plan and would likely require an additional environmental impact statement. Targhee officials have no plans to allow timber harvest in Management Area 5 and none is contemplated for the future. Therefore an economic analysis of timber harvest on the Targhee National Forest portion of the area covered by the draft EIS is not necessary.

Comment

M-15 The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as far as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it. [Comment Index Number: 93, 104, 122, 123, 124, 132, 133, 134, 136, 147, 148, 149, 152, 159, 168, 172, 183, 185, 186]

Response

M-15 The proposed action represents a compromise between wilderness and nonwilderness use in the Centennials. Of the 72,885 acres in the study area, 26,248 acres would be designated wilderness, however 46,637 acres would continue to be available for nonwilderness activities (p. 50).

Comment

M-16 The proposed action, as well as many of the other alternatives of the DEIS, favors commodity development. The economic value of the commodities is clearly stated for each alternative. But what is not clear is the value of environmental quality; fish, wildlife and botanical habitats; high quality drinking water; archaeological sites; and scenic and aesthetic attributes. The final EIS should include a discussion of how these natural values are compared to the quantifiable commodity values and how they are factored into the suitability determination. [Comment Index Number: 47]

Response

M-16 Initial scoping of public interest indicated support for an economic analysis which considered the effect on jobs and income rather than economic efficiency analysis. An economic efficiency analysis would consider the dollar benefits and dollar costs of a specific project through time. Economic efficiency analysis can be included in the environmental assessment for specific projects.

There are no plans to harvest timber from the Targhee National Forest portion of the area covered by the draft EIS. Current direction in the Targhee National Forest Land Management Plan precludes timber harvest in Management Area 5. Thus, timber harvest will not occur unless the direction in the plan is changed. Such a change would require a revision to the plan and would likely require an additional environmental impact statement. Targhee officials have no plans to allow timber harvest in Management Area 5 and none is contemplated for the future. Therefore an economic analysis of timber harvest on the Targhee National Forest portion of the area covered by the draft EIS is not necessary.

Comment

M-17 Page ii, Summary: Alternative 2, paragraph 3 states "present leases represent potential impact on 33 percent of unstable soils. However, development is not likely during the life of the leases." Since it is unlikely that these leases would be developed in any case, how was this accounted for in the assessment of economic impacts? Restrictions on leases under any alternative would presumably be of little economic impact if it is unlikely that they would be developed at all . . .

Also, this section does not address the current or potential oil and gas leases. If they are not a factor in the economic conditions of the area then perhaps the relative availability of acreage for leases should not be factored into the economic consideration of the various alternatives as presented in the summary section. This gives the appearance that the loss of these leases creates a negative economic impact, but this does not appear to be documented elsewhere in the EIS. [Comment Index Number: 47]

Response

M-17 As the draft EIS indicates, (p. ii) under Alternative 2, "development is not likely during the life of the leases." For this reason, the minerals resource specialist did not project any impacts from development of oil and gas. Thus, no impacts from oil and gas development were included in the economic analysis.

Comment

M-18 These elements are not discussed in a consistent enough manner in each alternative to allow comparison of the relative economic values or impacts between alternatives, i.e., Alternative 1 states that current vehicle use is already primitive while Alternative 2 alludes to more extensive use of motorized vehicles. The effects of the geographic boundary differences between alternatives and their relationship to livestock management areas are unclear. Discussion of economic considerations fail to document the importance, if any, of these increased AUM's or the severity of the consequences of vehicle restriction to existing local livestock producers.

The relationship of the number of jobs to the factors on the livestock industry presented here is unclear. Only Alternative 2 shows a difference in the number of jobs potentially available. What is the rationale for this relationship? Is it consistently evaluated among all the alternatives? What is the significance, if any, on the local livestock economy? [Comment Index Number: 47]

Response

M-18 With regard to livestock related jobs in Table 4-6, Alternative 2 shows a decline, since it is the only alternative that projects a decline in grazing use. Under Alternative 2, grazing would decline from 2,800 AUMs to 2,440 AUMs. Jobs in the livestock industry are directly related to levels of grazing. The significance is that 360 AUMs (2,800-2,440) would not be available, if Alternative 2 is selected, to generate income and employment in the local economy. Vehicle restrictions on national forest land prevent motorized transport of material into the area for range improvement maintenance, such as maintenance of water developments which are used by wildlife as well as livestock (See also Response M-17).

Comment

M-19 The economic analysis presented in the Centennial Mountains Wilderness Study/Draft Environmental Impact Statement (DEIS) is incomplete and misleading. As in the analysis of below-cost timber sales, the DEIS focuses on a narrow subset of economic impacts of the different alternatives to the exclusion of their relative costs and benefits. While the impacts presented — local income and employment — are certainly important to consider, they provide the public with no way of judging which alternative produces the largest net social benefits. Moreover, the DEIS appears to exaggerate the income and employment impacts of snowmobiling and to exclude a number of other sources of recreation income and employment known to be important in adjacent areas . . .

At a minimum, the Centennial Mountains DEIS should display the value of the different benefits and costs produced by each alternative. The DEIS does present the recreation use levels and the quality of other outputs, such as timber and grazing, associated with each alternative. From this, one can tell that the preferred alternative results in 100 fewer recreational visitor days (RVDs) of snowmobiling and roughly 2 million board feet less timber production than the no wilderness alternative. However, there is no way to tell from the information presented in the DEIS whether or not this represents a worthwhile trade-off. [Comment Index Number 87]

Response

M-19 A more extensive economic analysis may be undertaken in the environmental assessment documents prepared for specific projects under the preferred alternative. The data on snowmobiling was developed with the assistance of personnel on the Targhee National Forest, through interviews with people who were knowledgeable on the expenditure levels of snowmobile recreationists in the Centennials-Island Park area (See also Response M-16).

Comment

M-20 In fact, since timber production in the Centennials losses money, the lower timber harvest under the preferred alternative would actually save society over $40,000 per year. The loss of snowmobiling opportunities, on the other hand, represents a loss of only $600 per year based on the value for snowmobiling currently used by the Forest Service ($6 per RVD). [Comment Index Number: 87]

Response

M-20 Timber production in the Centennials does not generally lose money. As p. 39 of the draft EIS indicates, Douglas-fir sawtimber stands occupy about 80 percent of the suitable forest land acreage. This is high value timber, whose revenue when sold often exceed costs of the sale.

Comment

M-21 We would note, however, that on its face the data in the DEIS is suspect. For example, the employment and income associated with snowmobiling appears to be greatly exaggerated. According to the DEIS, the 596 RVDs of snowmobiling under the no wilderness alternative generates 8 jobs and nearly $93,000 in local income. This represents a "multiplier" of 13.4 jobs and $155,399 in income for every 1,000 RVDs of snowmobiling.

In contrast, the Beaverhead National Forest, which manages a portion of the Centennial Mountains WSA, assumes that for every 1,000 RVDs of snowmobiling only 0.8 jobs and $4,000 in income will be generated. In other words, the DEIS assumes that 17 times more employment and nearly 40 times more local income will be generated by snowmobiling in the Centennial Mountains than on the nearby Beaverhead National Forest.

Using the multipliers developed on the Beaverhead, the 100 fewer RVDs of snowmobiling under the preferred alternative would cause a reduction of less than one-tenth of one job and $400 in local income, rather than the 1 job and over $15,000 in local income claimed in the DEIS. [Comment Index Number: 87]

Response

M-21 The economic impact of snowmobiling is specific to those lands covered by the draft EIS. After review by Targhee personnel of the initial IMPLAN modeling effort for the draft EIS, it was felt that the economic impact of snowmobile recreation was understated. To determine if this economic impact was in fact understated, Targhee personnel interviewed retail merchants in the Island Park area, who supply equipment and services to snowmobile users in the Centennial Mountains. The data gathered in these interviews was used to estimate the final demand expenditures and generate the employment and income estimates which appear in the draft EIS. One factor that increases expenditures is that 40 percent of the snowmobile use is estimated to be on the rental basis.

Documentation of the employment and income figures are on file in the Supervisor's Office, Targhee National Forest, St. Anthony, Idaho.

Comment

M-22 The DEIS also appears to exclude the income and employment impacts of all types of recreation other than snowmobiling and elk hunting. While these are the only types of recreation for which employment and income are reported, they account for less than 60 percent of total recreational use in the Centennial Mountains WSA. On the Beaverhead National Forest, recreation other than big-game hunting and snowmobiling account for over a third of all recreation income and employment. [Comment Index Number: 87]

Response

M-22 No projections of employment and income were done for any recreation activity other than hunting and snowmobiling. As indicated in the tables in Chapter 4 of the draft EIS, levels of use of recreational activities other than hunting and snowmobiling are not predicted to change between alternatives regardless of which alternative is selected. Therefore, only projections of employment and income were analyzed for hunting and snowmobiling for each alternative.

Comment

M-23 In Alternative 2—100 percent wilderness—livestock grazing continues at present levels. It is not clear whether this means no livestock-related jobs will be lost. Please clarify, remembering that permittees may be allowed vehicle use where necessary in wilderness. [Comment Index Number: 77]

Response

M-23 As indicated on p. 57 of the draft EIS, the opportunity to increase livestock grazing by 375 AUMs over present use would be foregone by wilderness designation. Motorized vehicles are not allowed inside wilderness boundaries on national forest lands. BLM grazing policy in wilderness allows for the use of motorized vehicles for use in maintenance and construction of rangeland improvements. Selection of Alternative 2 is projected to result in a loss of one livestock related job per year as compared to the other alternatives.

Comment

M-24 The discussion in the DEIS of the impact on jobs of each of the alternatives needs to be expanded. You have not addressed in any way the cumulative effect on the affected communities of the planned reductions in timber harvest on both the BLM and Forest Service lands. Because of the major reduction in harvest hundreds of jobs will be lost in the near future as compared to the 18 potential jobs you say will be foregone under your proposed action.

We would like to see you expand your economic study to show the costs to the taxpayer of each of your alternatives. You have not shown any discussion of the cost to the federal government to designate and/or manage the proposed area for wilderness. Likewise there is no discussion of the potential loss to the federal treasury that will occur as a result of placing 10,200 acres of suitable timberland into wilderness. The economic study should also focus on the local communities and the effect of the proposed action on the local tax base. If a complete economic analysis is done we are confident that you will agree with our proposal for multiple use management for the entire study area. [Comment Index Number: 88]

Response

M-24 The jobs projected to be sustained under each alternative includes the direct, indirect, and induced impacts through all sectors of the local economy. Our analysis does not indicate that hundreds of jobs will be affected by selection of any one of the alternatives. No economic efficiency analysis was included in the draft EIS. Economic efficiency analyses may be included in the environmental assessments prepared to support specific projects under the selected alternative (See also Response M-32).

Comment

M-25 The D.E.I.S. underestimated the value of timber in the area, particularly the fact that other sources of timber for the Dillon sawmill have decreased to the point that the allowable cut from this area could make the difference in the mill running or shutting down.

Cost of wilderness management and fire control were not analyzed. The large fires in the Sleeping Giant area near Helena caused the Forest Service to spend $500,000 to reclaim creek channels. This does not include the cost of grass seeding and other reclamation. Those long term costs were not included or analyzed in the D.E.I.S.

In summary the timber from this area is critical to the survival of the sawmill in Dillon. This mill accounts for 1/3 of the Dillon economy in my estimation. [Comment Index Number: 64]

Response

M-25 The economic analysis attempts to analyze the employment and income created in the local economy through timber harvest activities.

Comment

M-26 The proposed alternative is relatively economically restrictive when compared with other management alternatives, ranking fifth of eight in producing local jobs and income . . . Since the study document concludes that Montana timber would most likely be used in Montana, Montana timber producers would lose 77 percent of the available timber from the study area . . . The question is asked: "How important is the timber in this area to local economies?" . . . The document does not provide the information necessary to answer this very important question. In addition, the above text does not address the need to view these individual agency decisions (regarding timber harvest restrictions) in context with the cumulative economic impacts associated with other recent Forest Service timber harvest decisions in the area. An assessment of the cumulative impacts to the area's timber harvest-related economy is needed to put the effect of the proposed significant harvest restrictions in perspective with the local and regional economic setting. [Comment Index Number: 53]

Response

M-26 While cumulative impacts of timber employment on lands outside the Centennials area are not within the scope of this draft EIS, the Beaverhead and Targhee National Forests have recently released environmental impact statements to accompany their forest plans. Review of the two forest environmental impact statements, together with this draft EIS should answer the cumulative economic impact question (See also Response M-32).

Comment

M-27 Analysis done in this Draft Environmental Impact Statement uses a ratio of 8.49 jobs per million board feet of timber harvested. Based upon this, then a harvest of 2.64 million board feet per year would support 22 jobs. This 2.64 million board feet harvest is based on no wilderness in the area . . . Adjusting your timber base or your annual harvest a little one way or the other doesn't really have the effect of increasing or decreasing 5 or 10 jobs locally. The local timber operators simply have to shift some operations to another area to maintain the same timber supply. This works as long as there is an overall adequate supply of timber.

However, in order to really analyze the effect on local jobs that designating a wilderness might have, you have to take a broad look at the entire timber supply for the affected area. This Draft Environmental Impact Statement did not do this. This document did not take into account that the Beaverhead National Forest plan calls for a 34 percent reduction in timber harvest on national forest lands during the next 10-year period, nor did it analyze the possibility of making up the difference of that reduction on other federal, state or private lands.

The combination of lower harvest on National Forest and BLM lands and additions to the National Wilderness System will cause closure of a local mill. The cumulative effect of these actions on the part of the Federal Government will cause over 100 real jobs to be lost to the local economy, not just the 18 potential jobs referred to in this document . . .

Alternative No. 1 was one of the four showing a negative economic impact. It is absolutely ludicrous that any government agency would select a proposed action that, by their own standards, will have a negative economic impact upon a local community when they have available to them alternatives that will provide for some positive economic impacts . . .

No where in the document is there any discussion of the cost to the Federal Government to designate and/or manage the proposed area for wilderness. Likewise, there is no discussion of the potential loss of revenue to the federal treasury due to not allowing timber harvest on 10,200 acres of suitable timber land being placed into wilderness. This document has completely ignored any loss in revenues to Beaverhead County and to the State of Montana due to taking lands out of production and placing it in wilderness . . .

Under the proposed action, timber harvest will be reduced by 77 percent due to 10,200 acres of suitable timberland being put into wilderness. We will be foregoing the opportunity to harvest 99.3 million board feet of timber. Our mill in Dillon must have 26 million board feet of timber each year in order to be able to continue to operate at the current level. The proposed action in this document will not allow the Dillon Resource Area, the BLM, to meet their annual harvest. The Beaverhead National Forest is only planning to sell 17.3 million board feet per year through the next decade. We are depending on the BLM to work to achieve their full potential of an annual harvest of 4.5 million board feet. [Comment Index Number: 9]

Response

M-27 It was not within the scope of this draft EIS to analyze the timber supply situation for the entire region surrounding the Dillon mill (See also Response M-32).

Comment

M-28 In addition, suitable timberland do not include the costs of doing business. Neither does the draft deduct the cost to recreation and wildlife in aesthetic resources caused by logging activities. The draft EIS does correctly state damage will occur to wildlife and recreation resources but further analysis is needed. The draft must value these losses and include them in a cost benefit analysis. The decision cannot be made from the best possible land allocation here without an objective analysis of all costs as well as the benefits of the various alternatives. [Comment Index Number: 22]

Response

M-28 Cost/benefit analysis may be included in the environmental assessment documents necessary to support specific projects under the selected alternative (See also Response M-16).

Comment

M-29 The business community in Island Park in the wintertime depends on winter recreation. If we shut the Centennials off to motorized, which is the snowmobile, you put quite a few people out of business, myself and a lot of other ones. [Comment Index Number: 36]

Response

M-29 An analysis was done, and included in the draft EIS to display the economic impact of snowmobile recreation under each alternative.

Comment

M-30 We would also like to have included in there the loss of money that the schools will have due to this wilderness area. I'm coming specifically from that in Idaho there are $10 million going through the counties each year to go to the schools and county governments. This money comes from grazing rights, leases, mineral rights, that type of thing that would be lost. [Comment Index Number: 39]

Response

M-30 In alternatives with lands managed as wilderness, there will be a loss of revenue to the counties. On national forest land, 25 percent of the revenue generated from multiple use management activities is returned to the counties.

Comment

M-31 We're hurting the businesses . . . that make money off snowmachiners and the tourists, like Hal Augustin says, he has a business there. And it thrives on snowmachining in the wintertime. Mack's Inn, the owners there would suffer quite a loss of business in the wintertime, also. [Comment Index Number: 41, 42]

Response

M-31 An analysis was done and included in the Draft to display the economic impact of snowmobile recreation in each alternative.

Comment

M-32 There is no place in the EIS which shows how much such timber harvest would eventually cost the taxpayer. Considering that many of the timber sales on the adjacent Targhee and Beaverhead National Forests are below cost, there is a real potential that each of the jobs attributed to timber harvest will cost a great deal more than just giving the money to local loggers not to log. I feel an estimate of the cost of timber sale administration, preparation, road construction, mitigation on soil erosion, fisheries, and wildlife losses should be presented and be available for comparison. [Comment Index Number: 6, 11, 22, 56, 79, 80, 110, 111, 129, 145, 189]

Response

M-32 Appendix O has been added to the final environmental impact statement to clarify the economic analysis presented in the draft.

Section N

Mineral Exploration and Development

Comment

N-1 Page 32, Mineral Resource Projection, paragraphs 2 and 3: The marketability of the mineral resources listed in paragraphs 2 and 3 should have been projected in the same manner as phosphate resources. Evaluation of the value and feasibility of resource development should include gross economic considerations such as the projected marketability of the particular resource and costs associated with site specific developments (i.e., full costs of development; transportation; measures necessary to mitigate environmental concerns; current and projected commodity levels nationally and locally and market projections). [Comment Index Number: 47]

Response

N-1 Projections were prepared for phosphate because it was the only mineral resource for which we had detailed resource information. Any projections for other mineral resources would be speculative.

Comment

N-2 All and gas exploration and mining activities could seriously impact groundwater in a region of sensitive aquifers. On page 33, the brief discussion on groundwater says the quality is "generally good." However, the DEIS makes no mention of these activities' impacts on the groundwater. Instead, the DEIS discusses the impacts of a wilderness designation on mineral and energy development. A discussion of all possible impacts to the groundwater should be included in the final EIS, for all alternatives. As an aside, depending on the amount of activity that has occurred in the area since 1979, the findings of Pettyjohn, et. al., may not be valid today. This issue should be addressed in the discussion about groundwater impacts. [Comment Index Number: 47]

Response

N-2 For a discussion of the impacts of oil and gas exploration and development and mining activities could have on groundwater refer to the Butte District Oil and Gas Environmental Assessment (USDI, BLM 1981b) and the Final EIS for Surface Management of Public Lands under the U.S. Mining Laws—43 CFR 3809 (USDI, BLM 1980 a) respectively.

Section O

Miscellaneous

Comment

O-1 We do not believe the DEIS adequately considers cultural resources as part of the affected environment or in terms of the environmental consequences of the proposed alternatives. We recommend that the following questions be addressed to establish the condition of the current data base and to assess the impacts that may be anticipated under each considered alternative:

Of the 26 sites recorded in the 72,885 acre area, how many are listed on the National Register? How many have been determined ineligible? How many require additional work to resolve eligibility? [Comment Index Number: 54]

Response

O-1 Of the 33 reported cultural properties in the 72,885-acre area, none of them are listed on the National Register. All of the reported cultural properties require a formal determination of eligibility.

Comment

O-2 How much of the area under consideration has been inventoried for cultural resources? How many acres remain unsurveyed? [Comment Index Number: 54]

Response

O-2 Approximately 5,000 acres have been inventoried for cultural resources; 67,885 acres have not been inventoried for cultural resources.

Comment

O-3 How many National Register quality sites may be reasonably expected in the considered area? Where are these likely to be located in relation to the various alternative areas? [Comment Index Number: 54]

Response

O-3 It is not known how many National Register quality cultural properties may be reasonably expected within the Centennials. It is not known where any National Register quality cultural properties will be located in relation to the various alternative areas.

Comment

O-4 What impacts to cultural resources may be anticipated under each alternative in relation to projected levels of impacts from various types of development (e.g., oil and gas, logging, spring developments, soil stabilization)? Note that neglect of a property resulting in its deterioration or destruction is considered an adverse effect (36 CFR 800.9b). [Comment Index Number: 54]

Response

O-4 At this time, it is impossible to anticipate impacts to cultural properties until inventories are conducted in the future proposed project areas. It is BLM policy, when feasible, to avoid impacts to cultural resources. Prior to any impacts on public lands, cultural inventories are conducted. Then, plans are made to avoid impacts to those cultural properties in the proposed project locations which are eligible for the National Register. If it appears that the impacts can not be avoided, the effect of the project on the site will be analyzed in consultation with the State Historic Preservation Officer and Advisory Council on Historic Places. When possible, data recovery as a mitigating measure will be implemented.

Comment

O-5 The DEIS is thus flawed in that it does not contain an alternative which includes all roadless lands in the Range. The draft Wilderness Inventory completed for the two Forests and the BLM concluded that some 89,500 acres (including the Sheep Station) were natural and possessed outstanding opportunities for primitive and unconfined recreation and ample opportunities for solitude. In addition, it listed supplemental values including at least two threatened and endangered species.

Conversationists add approximately 3,000 acres to the draft Wilderness Inventory assessment. Our boundary includes the lands acquired by the BLM on the western edge of Price Creek in the First Continental land exchange. It also includes several State sections which, we understand, are currently being considered for exchange as well. Both these additions will enhance the wilderness qualities of the Centennials. The area west of Price Creek provides important fall and winter range for elk. The State sections will provide additional protection for Red Rocks Refuge, a goal of the BLM.

Our proposal excludes the East Fork of Dry Creek Road, the phosphate mining area on Taylor Creek and road, the Keg Springs road, and the Tin Cup slate mine and road.

The conservationist proposal provides additional protection for the Centennials over and above that of the DEIS's Alternative 2. It includes readily identifiable roadless lands which should have been analyzed by the BLM but were not. The DEIS should be redone to include a 92,000 acre all-wilderness alternative. [Comment Index Number: 87]

Response

O-5 Essentially all the lands encompassing the 92,000 acres have been considered and most have been inventoried at one time or another. The lands acquired in the First Continental Exchange were inventoried with those lands not qualifying being dropped from further consideration. When the ongoing exchange with the State of Montana is finalized those lands qualifying will be added to the wilderness study area. A discussion of options considered and the rationale for dropping is found on page 25 of the draft EIS. Sheep Station lands plus some lands managed but not designated by the Fish and Wildlife Service adjacent to the Centennials are included in the All Wilderness Alternative.

Comment

O-6 Portions of the CMWSA and adjacent areas have been designated as: ACEC (Area of Critical Environmental Concern) (BLM); National Natural Landmark (Red Rocks Refuge); Research Natural Area (USFS) . . . The DEIS fails to explain the meaning of these terms, to assess the impacts on these areas, and to ensure that the special attributes for which these areas were designated will be protected under the plan. These deficiencies must be remedied in the revised EIS. [Comment Index Number: 91]

Response

O-6 No portion of the Centennial Mountains has been designated as an Area of Critical Environmental Concern. A couple areas were recommended for consideration in the planning process but nothing has been designated. The Management Framework Plan says "Consider . . . the Centennial Mountains from Nemesis Mountain to Pine Creek for designation as ACECs."

Comment

O-7 The EIS fails to consider or mention the option of acquiring by exchange the state lands in the wild Centennials and thus consolidating Federal ownership and making feasible a unified, greater Centennial Mountains Wilderness. This must be done in the final EIS. [Comment Index Number: 1, 2, 7, 10, 12, 53, 64, 65, 77, 80]

Response

O-7 Of the tracts of state lands under the administration of the Montana Department of State Lands and proposed for acquisition through exchange by the BLM, it is likely that all of them will be added to the wilderness designation. All except the westernmost tract have the same qualities and characteristics as recommended lands that surround them and they would compliment the area. Addition of these tracts is discussed in the final Environmental Impact Statement.

Comment

O-8 I believe your EIS should consider how the Centennials fit into the overall ecosystem concept. Your present plan isolates the range as a mountain uplift giving no consideration to its potential for combination with other public lands into a major biological preserve. I urge you to consider how this alternative might fit in with the Americans for Wilderness Coalition proposal for a Gravelly-Snowcrest-Centennial Biological Preserve and Wilderness Recovery Area. This proposal calls for the designation and unified management of the Red Rock Lakes Wildlife Refuge, Centennials and Forest Service lands in the Gravelly and Snowcrest Ranges to be managed primarily for their wildlife and biological values. It would designate all presently roadless country as wilderness and authorize the closure of most existing roads except for major traffic routes. [Comment Index Number: 189]

Response

O-8 The EIS is intended to evaluate the effects of designation or nondesignation of the Centennials, or a portion thereof, on adjacent lands and resources. This area is separated from the Gravellys by quite some distance comprised of the Red Rocks Wilderness area and much land with varying degrees of development. If boundaries are not defined narrowly, it is difficult to draw the line as far as having areas included and evaluated with the Centennials, or any other area being studied for wilderness.

Comment

O-9 There is no discussion on mitigation of adverse impacts under any of the alternatives. This includes those activities already permitted or existing within the boundaries of the study area. It is difficult to evaluate the relative adverse impacts from various developments without an assessment of the potential for mitigation at a given location. [Comment Index Number: 47]

Response

O-9 For lands considered for nonwilderness in each alternative, the existing land management plans for the Beaverhead National Forest, Targhee National Forest and BLM provide mitigating measures to protect resources during management activities. Among these are a list of Best Management Practices (Appendix L) to reduce impacts on soils and water quality; the Elk/Logging Guidelines (USDA, FS 1982c) to reduce impacts on elk habitat; stipulations prohibiting surface occupancy on oil and gas leases to reduce impacts on visual resources, soils, and wildlife habitat; and the Grizzly Bear Guidelines (USDA, FS 1979) to reduce impacts on grizzly bear habitat. The adverse impact discussed in the draft environmental impact statement included only those which remain after mitigation measures are applied. Mitigation measures are identical in the appropriate management plan generated by the activity proposing some development.

Comment

O-10 In the context of the sheep station, what management problems are foreseen for the southern wilderness boundary under Alternative 1? How could these problems be resolved administratively? Could Congress resolve these problems by designating a portion of the adjacent sheep station summer range as wilderness? Please explain . . .

Where an adjacent private landowner objects to wilderness, discuss the potential for a land exchange to relocate such owners to a nonwilderness setting . . .

On a map, indicate the size and proximity of the designated wilderness lands managed by the Fish & Wildlife Service. Are there any nonwilderness lands managed by FWS that are contiguous to the Centennials WSA? If so, explain why they are not recommended for wilderness here and include them as recommended lands where suitable in the supplemental EIS requested above . . .

In Alternative 1, several WSA parcels in Montana are **not** recommended for wilderness, but they would be if Alternative 6 were chosen. Explain with particularity why these areas are omitted in Alternative 1 . . .

Why do you presume it would be illegal to use a motor vehicle to transplant a mountain goat when motor vehicles may be used for other administrative purposes and by grazing permittees when necessary? . . .

Is the SCS snow course indicated on any map in the DEIS? If not, please so indicate. Explain the activities involved . . .

Of the 46,637 acres not recommended for wilderness in (preferred) Alternative 1, only 4,010 acres are expected to suffer development (DEIS at 51), and only 5,675 acres are appropriate for snowmobiles (*Id.*). Identify these lands and the remaining 37,000 acres on a map. Explain why none of the remaining 37,000 acres was recommended for wilderness. Of those 37,000 acres, identify the lands suitable for wilderness designation and include them in the Alternative response to Point One above.

The DEIS contradicts itself: "Wilderness designation would adversely affect black bear, mule deer, moose, and blue grouse by prohibiting logging." DEIS at 56 (successional vegetation). "Wilderness policy and existing fire management plans may result in more timber burned and vigorous forage production." DEIS at 53 (good for the soil at the fire temperatures associated with regular natural burns). A similar contradiction occurs as to livestock forage on p. 57.

What is the status of the trespass and erosion problems outlined in Appendix D, p. 108? What enforcement measures are being or will be taken? [Comment Index Number: 77]

Response

O-10 Wilderness designation could be beneficial to the Agricultural Research Service by eliminating off road vehicles (ORVs) except in designated areas. Various scenarios could be implemented assuring the Sheep Station's continued use of the area in relation to grazing, base of operations, etc. Continued sheep grazing and experimentation can be assured under a grazing lease and bases of operations can be delineated to assure their continued use. BLM will work with the Agricultural Research Service to resolve problems that may arise (ORVs) from the south. The Sheep Station is included in the All Wilderness Alternative. The Red Rocks Wilderness and its proximity to the Centennials is shown on the land status map. Nonwilderness Fish and Wildlife Service lands have been included in the All Wilderness Alternative as shown on the map.

Boundaries on the alternatives other than the proposed action were the original study area boundaries. The proposed action eliminated tracts that should not be included in wilderness designation for one reason or another, i.e., Ski Chalet or other intrusions.

Use of motorized vehicles in wilderness areas is a controversial subject at best and our guidelines come from the Wilderness Management Policy for the Department of the Interior, September 1981. Exceptions are identified for grandfathered uses and certain other activities. In the case of transplanting mountain goats, two access roads through the Targhee National Forest to the south would allow access to the Continental Divide for such activities.

The Soil Conservation Service's snow course is shown on the Existing Impacts to Wilderness Values map in back of the text. Their activities consist of periodic accessing their monitoring sites by snowshoe, skiing or snowmobile, this course was established in 1948 and provided for motorized access.

The area for timber harvesting, building stone mine and past phosphate mining are shown on the Existing Impacts to Wilderness Map. However, Simplot has recently expressed an interest in relinquishing their claims in the Centennials and rehabilitating the sites.

A change was made in the document to reflect the successional change possible through fire to offset that which is lost by not logging.

If the Sheep Station is included in a wilderness designation, BLM will be working with them to eliminate trespass and erosion problems and provide overall management most favorable to preserving the resources.

Comment

O-11 The Management Framework Plan, dated September 10, 1979, and identified as Appendix D, references the "SEA" or the Science and Education Administration. The Agricultural Research Service is the appropriate agency identifier. Please make this correction.

The plan is nearly 8 years old and has not been updated to reflect the statutory change in land management responsibilities effected in 1981. In addition, given the age of the plan and the date of the draft EIS, it is not understood how the plan can be used to substantiate/support current impact analyses. (See NEPA regulations 1502.18(b).)

The Plan includes statements on ARS' unwillingness to cooperate. First, how are these statements relevant to the context of a Wilderness Study, the scope of which does not include the USSES. Second, we have nothing in our files to indicate "a failure to cooperate." The BLM needs to produce documents or correspondence to support claims which appear to be unsubstantiated. Further, the reference to having the issue of "lack of ARS cooperation" resolved at the Washington level (p. 112) is unknown. Was recent contact made with ARS? The enclosed letter dated October 29, 1980, signed by the then Director of BLM has application to the draft EIS/Appendix, particularly paragraph three which states that BLM does not advocate revocation of the ARS public domain land withdrawal. The letter contradicts statements made in the draft EIS. The inconsistency in BLM position needs to be addressed. [Comment Index Number: 44]

Response

O-11 The BLM has land exchanges and other actions that change the land management responsibilities on an annual basis and does not update its plans annually to address this. Plans are made involving a great deal of thought and public involvement so that the management direction for a given area is valid for some period of time rather than changing direction every year or so. BLM involvement on the Sheep Station ceased with passage of the 1981 Farm Bill. Since this change was legislated by Congress, no plan amendment or environmental impact statement was required.

The final environmental impact statement will be corrected wherever the Agricultural Research Service has been called the Science and Education Administration.

In preparing the final EIS much coordination was done with all levels of the Agricultural Research Service. Necessary information was obtained and a good working relationship was established.

Comment

O-12 One of the major components of an EIS is the inclusion of appropriate mitigation measures 40 CFR 1502.14(f) and 1502.16(f) and 1502.16(h). In some cases mitigation is offhandedly mentioned in the EIS—such as allowing wildfires to burn in wilderness areas to offset habitat losses to advanced seral stages and an elimination of logging or habitat manipulation (page 57). This type of mitigation should be developed in much more detail for each adverse effect as a result of wilderness designation. For example, the loss of 100 RVDs as a result of the closure of the Odell Creek Canyon Loop Trail to snowmobile use could be compensated for by developing an alternative trail in suitable terrain out of the designated wilderness area. Appendix L lists BMPs suitable for mitigating some of the impacts of roading and logging only. Nothing is mentioned for mitigating the impacts of wilderness designation. The lack of developing these mitigation measures for wilderness designation skews the consequences of wilderness designation unfairly in a negative direction and hence reduces both the overall likelihood of obtaining any type of wilderness designation or at best reduces the total amount of wilderness protected. [Comment Index Number: 56]

Response

O-12 Mitigating loss of the snowmobile trail out of the area is not very practical, although it was considered. Such a trail would add too many miles to what people have used for years.

Mitigation for wilderness designation is not necessary in this case because of the management prescription for the area if it doesn't go wilderness. The area west of Matsingale Creek would be open to development and subsequent mitigation established in the management plans.

All activities with valid existing rights will be allowed to continue. All other nonwilderness activities will be precluded unless specifically provided for through legislation.

Comment

O-13 (There) is a lack of clarity in the logic for preferring Alternative 1 over the other alternatives. The reader has to frequently guess at the weighting applied to the advantages of the various alternatives. Comments on the non-preferred alternatives are scattered and their importance difficult to evaluate. For example, are the difficulties of enforcing a mid-scope boundary south of the divide more serious than enforcing wilderness regulations in some of the narrow sections of the preferred alternative? Are the visibility of disturbances from earlier human activities sufficient to disqualify areas in the southeastern portion of the study area? I think the reader would benefit from some summary explaining the criteria applied to the various alternatives and how the application of these criteria led to the selection of the preferred alternative. [Comment Index Number: 102]

Response

O-13 Criteria used to evaluate the various alternatives are described in some detail on page 4 of the draft EIS, and a summary of impacts of the alternatives is shown on page 26 of the draft EIS.

The proposed action was determined to be the best after the interdisciplinary team and management analyzed issues, boundaries, public input, applicable management prescriptions, disturbances, intrusions, etc.

Comment

O-14 We assume that we will be able to maintain and service (Lakeview Canyon snow course, located in Sec. 26, T. 14 S., R. 2 W., and Lakeview Ridge snow course (new and old), and Lakeview Ridge SNOTEL, located in Sec. 27, T. 14 S., R. 2 W.,) with motorized vehicles under our current Right-of-Way Reservation, even if the area is designated wilderness or that wording will be included in the wilderness bill that will permit operation comparable to the Right-of-Way Reservation. [Comment Index Number: 46]

Response

O-14 It is not the intention of the BLM to deny uses that are valid or grandfathered so long as they are nonimpairing to the wilderness values. Special provisions will probably be necessary in the language of the bill designating this area as wilderness to clarify and substantiate this.

Comment

O-15 The Montana Power Company provides electrical service to much of southwestern Montana via a number of transmission lines; hence, we must be assured access to all existing and potential **future** customers throughout the area. The Montana Power Company urges you to include a provision in the final EIS for any existing and future utility and transportation corridors that may be necessary when the area's mineral resources become actively sought after and extracted. [Comment Index Number: 68]

Response

O-15 Wilderness designation generally precludes mineral exploration and extraction thus there should be no need for electrical service. It doesn't seem likely that anyone will be living in the Centennials that would warrant installing powerlines. Anyone on the Idaho side needing power would probably be supplied by Idaho Power, et al.

Comment

O-16 We are very concerned that the existing wilderness will not be retained in entirety while at the same time, the sheep experiment station will apparently remain. Because the sheep experiment station will apparently remain, it is even more important that de facto wilderness be formally designated, because security from human harassment, disturbance, and killing is of elevated, paramount concern where sheep grazing is allowed in grizzly bear habitat. If, however, the sheep experiment station were to be closed down, I'd be less apprehensive about loss of the security that will occur if wilderness acreage is developed rather than designated for permanent protection.

The 16,650 acre sheep experiment station is a puzzling enterprise in that it is purportedly for scientific research purposes but the research conducted there is not dependent on that site and at least some of the research appears to be of debatable scientific merit. While we recognize that the sheep station has been taken out of your jurisdiction, its presence and its continued operations do have real and serious potential to affect grizzly bears and other wildlife, and its role is not adequately depicted in the DEIS . . .

Again, we realize that the sheep station was taken out of joint USFS-BLM jurisdiction in 1981, and it was not included in your study leading to the DEIS. However, the future of threatened and endangered species in the Centennial Mountains will certainly be affected by the sheep station's own cumulative impacts; the existence of these impacts adds to the importance and relevance of remote, roadless acreage elsewhere in the Centennials and should therefore be considered in your final recommendations for wilderness designation. [Comment Index Number: 1, 2, 6, 7, 11, 14, 20, 23, 27, 29, 32, 34, 50, 59, 64, 66, 71, 72, 77, 78, 82, 83, 85, 86, 87, 88, 90, 92, 95, 98, 99, 109, 110, 111, 112, 113, 119, 125, 127, 128, 131, 142, 145, 156, 157, 163, 166, 167, 170, 175, 178, 179, 181, 184, 187]

Response

O-16 Changes have occurred since preparation of the draft Environmental Impact Statement. The Sheep Station lands are analyzed in the All Wilderness Alternative in the final Environmental Impact Statement. The Agricultural Research Service has been involved in this analysis as well as providing information regarding impacts to the Sheep Station and vice versa on the other alternatives.

Comment

O-17 The DEIS does not consider the impacts of wilderness designation in the sheep experiment station . . . Congress should be informed of the environmental impacts of wilderness designation for these lands. Merely because your agency does not have legal authority to carry out this action is no excuse under NEPA for failing even to consider the impacts of this alternative. [Comment Index Number: 150]

Response

O-17 See response to Comment O-16.

Comment

O-18 We would also like to see a better definition, make it very clear to the people reviewing this what a wilderness area really means. I'll give you an example, where you're standing right now. This area here. If this was federal land and if the roads were not mechanically maintained for one year, you could qualify it as a wilderness area. We would like to see that definition clarified and included in there so people know that areas that really had roads, looks like a road, smells like a road, would be included as a very clear definition in there. [Comment Index Number: 39]

Response

O-18 BLM's mandate to study public lands for potential wilderness designation is outlined in the Federal Land Policy and Management Act of 1976, the Wilderness Act of 1964, and the BLM's Wilderness Inventory Handbook dated September 27, 1978.

Comment

O-19 Private land is listed as an impact to the wilderness area on the map "Impact to Wilderness Values" included in the back of the DEIS. It certainly would affect solitude, among other things. Since private land within one-half mile of a wilderness area is a degradation to wilderness values, why is the preferred alternative one which borders the overwhelming majority of private land in the area? This should also be explained in the final EIS . . .

Finally, what is the basis used to choose the geographical boundaries of the various alternatives? For example, the proposed alternative is most of that WSA north of the continental divide, but not all. Why not? What is the distinquishing feature that excludes the northwestern portion of the study area from becoming part of alternative 1? Also, each time the land in the Beaverhead National Forest was considered in an alternative, it was considered in its entirety. But not so for Bureau of Land Management (BLM) or Targhee National Forest land. Why not? What were the criteria for choosing the bounds of each alternative? The answers to these questions should be discussed to give a better understanding for the consideration to environmental quality that was given in choosing viable alternatives for areas to be designated as wilderness.

Page 51, Alternative 1, proposed action, Effects on Wilderness Values: First full paragraph states, "on lands not recommended for wilderness, wilderness values will generally be retained." This statement should be more fully explained. What is the rationale for not designating an area to wilderness if the intent is to retain wilderness values in that area? How will this be accomplished? Similar statements appear elsewhere and should likewise be clarified (i.e., page 52, Effects on Wildlife Habitat, column 2, conclusions: "However, on most of the lands not recommended wilderness, wildlife values would remain the same"). [Comment Index Number: 47]

Response

O-19 The proposed action does not border any more private land than some other alternatives, nor as much as some, i.e., Alternative 2 and Alternative 6.

Some of the lands not recommended for wilderness are not conducive to development and if they are, the development may not be detrimental to wilderness values.

The Management Framework Plan completed in 1979 which directs the management of this area identified all BLM land east of Matsingale Creek to be managed as a roadless area. This is due to values found there. These values will be protected even if the Centennials are not officially designated as wilderness.

If the same boundaries were used for each alternative there would be only one alternative. The BLM tries to come up with alternatives that would make logical management units and evaluate them accordingly. Such is the case with Targhee and BLM land. The portion of Beaverhead National Forest is primarily in one drainage and would result in a chopped up pattern if not totally designated. When a tract of land is evaluated, there are certain criteria that must be applied such as providing the greatest opportunity for solitude and primitive recreation by eliminating impacts to naturalness and other wilderness qualities. A high quality road, spring developments, and old logged areas eliminate this area from qualifying.

Comment

O-20 It is felt that the draft EIS has failed to assess, in accordance with the National Environmental Policy Act (NEPA), impact of wilderness classification on ARS holdings . . . Areas of impact would include reduced human activity on wilderness lands; increase in wildlife population; access to adjacent lands for locating stray/missing sheep; etc. (See NEPA Reg. 1502.16.) In various portions of the EIS (pp. 55 and 62, for example, comments are made on the negative impact of ARS holdings on wilderness classification. Specific data needs to be cited in support of these statements. (See NEPA Regulations 1502.22.) [Comment Index Number: 44]

Response

O-20 There would be no expected changes in human activity (increase or decrease) on wilderness lands as they have been managed as a primitive area since its designation in 1975. Access to adjacent lands for any purpose, even locating stray or missing sheep will not legally change as the BLM lands have been open to foot and horseback access but closed to motorized access since the 1975 designation. Motorized vehicle access is no longer controlled on the Sheep Station and may provide routes onto areas recommended for wilderness. Wildlife populations should not change from when the area was managed as a primitive area. The above mentioned lack of control over off road vehicles is anticipated to negatively impact any areas designated as wilderness due to trespass problems.

Comment

O-21 Any long-term wilderness designation in the Centennials will only serve to fragment the ecosystem more and deteriorate management thereof. The wilderness boundaries of this proposal and all other wilderness proposals in this EIS are so erratic that an expert would have difficulty following them. To identify this proposed wilderness on the ground to the public is an impractical task and would in itself destroy the natural qualities of the area. The travel restrictions imposed in Montana and Idaho pretty much protect those areas which have wilderness qualities, yet give the healthy and active public needed access to experience these qualities. As it is now, it is left up to the individual to determine if he or she is having a wilderness experience while touring the Centennial Ecosystem and I cannot see this significantly changing under carefully managed multiple use. Under any wilderness proposal the land is so fragmented that visitors would constantly be looking for signs telling them they are having a wilderness experience. As far as demand of the public to experience the present wilderness qualities of the Centennials, other than during hunting season, in the last 20 years I have only seen one individual hiking in the area for recreation. [Comment Index Number: 60, 136]

Response

O-21 It is agreed that the boundaries would be difficult to identify. That is why attempts are made, to the extent possible, to place the boundaries in places that are easily identifiable and practical to manage. With new directions since the draft was written, the Sheep Station will be analyzed in the All Wilderness Alternative. This will provide the most reasonable boundaries and include some of the highest value lands for wilderness.

A land exchange with Montana Department or State Lands in the Centennials is in process. Three tracts totaling 1,280 acres have been transferred to the BLM. The remaining two tracts will be exchanged when circumstances are amenable.

LIST OF PREPARERS

The Butte District of the Bureau of Land Management, Department of the Interior is the lead agency in the preparation of the Centennial Mountains Wilderness EIS. The Targhee National Forest and the Beaverhead National Forest of the Department of Agriculture are cooperating agencies.

Project Management for Draft Environmental Impact Statement

Philip A. Gezon served as the project manager for the BLM. His qualifications include experience as an interdisciplinary team member for the Garnet RMP/EIS, technical coordinator for the Missouri Breaks Wilderness Suitability Report EIS and the Bitter Creek Wilderness EIS. He is an Outdoor Recreation Planner (7 years) with the BLM. He has a BA in History from Kenyon College and a MS in Outdoor Recreation Management from the University of Oregon.

Paul R. Oakes served as the project manager for the Targhee National Forest. His qualifications include experience on several EISs including the Targhee National Forest Plan, the West Slope Tetons and Island Park Unit Plans, the Targhee Geothermal Leasing Plan, and RARE II. He is an Assistant Forest Planner with the Forest Service (five years) and was a Soil Scientist (nine years). He has a BA in Biological Science from Boise State University.

Sherry L. Milburn served as the project manager for the Beaverhead National Forest. Her qualifications include experience as co-author of the 1985 Revised Draft EIS and Proposed Forest Plan and the 1986 Final EIS and Forest Plan for the Beaverhead National Forest. She also served as technical assistant to the planning team for the 1978 Beaverhead EIS and Forest Plan. She is presently Public Affairs Specialist for the Beaverhead National Forest. She has a BS in Biological Science and an MS in Counseling from Eastern Montana College.

Carole Mackin served as technical coordinator. Her qualifications include experience on several EISs including the Garnet and Headwaters Resource Management Plans and the Dillon and Headwaters Wilderness Planning Amendments. She is a Writer-Editor for the BLM (one year) and was an Environmental Specialist (two years). She has a BS in Zoology from Northeast Missouri State University.

Interdisciplinary Team for Draft Environmental Impact Statement

Recreation Resources

Bruce Botsford served as the team specialist for recreation on public lands. His qualifications include experience as a project manager on the Dillon Wilderness Planning Amendment/EIS. He is an Outdoor Recreation Planner with the BLM (10 years) and has worked for the Heritage Conservation and Recreation Service (10 years). He has a BS in Conservation from Wisconsin State University.

Tim Kimble served as the team specialist for recreation on the Targhee National Forest lands. His qualifications include experience as an interdisciplinary team member on the Targhee and Sierra Land Management Plans/EIS. He is a Recreation, Lands and Minerals Assistant with the Forest Service (eight years) and was a forester with the Wisconsin Department of Natural Resources (one year). He has a BS in Forest Management Science from Colorado State University.

Forestry Resources

William D. Torgersen served as the team specialist for forestry resources on public lands. His qualifications include experience as an interdisciplinary team member on the Foothills Grazing EIS, Headwaters RMP/EIS, and the Dillon Wilderness Planning Amendment/EIS. He is a forester with the BLM (23 years). He has a BS in Forest Resource Management from the University of Minnesota.

Bruce Padian served as the team specialist for forestry resources on the Targhee National Forest lands. He is a Timber Management Assistant with the Forest Service (ten years). He has a BS in Forest and Watershed Management from Utah State University.

Kevin R. Schulkoski served as the team specialist for forestry resources on the Targhee National Forest lands. His qualifications include experience as an interdisciplinary team member on the Payette National Forest Land Management Plan/EIS. He is a Supervisory Forester with the Forest Service (eight years). He has a BS in Forest Management from the University of Montana.

Watershed Resources

David A. Lomas served as the team specialist for watershed resources for the public lands. His qualifications include experience as an interdisciplinary team member on the Headwaters RMP/EIS and the Mountain Foothills EIS. He is a Hydrologist with the BLM (eight years). He has a BS in Forestry from Michigan Technological University and a MS in Watershed Science from Utah State University.

George Matejko served as the team specialist for watershed, range, and wildlife resources on the Targhee National Forest lands. His qualifications include experience as an interdisciplinary team member on the Targhee National Forest Plan/EIS. He is a Resource Assistant with the Forest Service (eight years) and was a Hydrologist with the BLM (two years). He has a BS in Forest Management.

Wildlife Resources

Lewis H. Myers served as the team specialist for wildlife resources on the public lands. His qualifications include experience as an interdisciplinary team member on the Mountain Foothills EIS and Colstrip EIS. He is a Wildlife Biologist with the BLM (21 years). He has a BS in Game Management from Humbolt State College and a MS in Zoology from the University of Nevada.

Dick Welch served as the team specialist for wildlife resources on the Targhee National Forest lands. He is a Wildlife Biologist with the Forest Service (24 years). He has a BS in Wildlife Management from the University of Montana.

Mark Orme served as the team specialist for wildlife resources on the Targhee National Forest lands. His qualifications include experience as an interdisciplinary team member on the Targhee National Forest Plan/EIS. He is a Wildlife Biologist with the Forest Service (eight years). He has a BS in Forestry and MS in Wildlife Management from the University of Idaho.

Mary Beth Maj served as the team specialist for wildlife resources on the Targhee National Forest lands. She is a Wildlife Biologist with the Forest Service (four years). She has a BS and MS in Wildlife Management from Montana State University.

Range Resources

L.I. Hagener served as the team specialist for range resources on the public lands. His qualifications include experience as an interdisciplinary team member on the Mountain Foothills EIS. He is a Range Conservationist with the BLM (seven years). He has a BS in Range Science from Montana State University.

Keith R. Tweedie served as the team specialist for range resources on the Targhee National Forest lands. His qualifications include experience as an interdisciplinary team member on the Targhee National Forest Land Plan/EIS. He is a Supervisory Range Conservationist with the Forest Service (21 years). He has a BS in Range Management from Utah State University.

Howard Lyman served as the team specialist for range resources on the Targhee National Forest lands. He is a Range Conservationist with the Forest Service (nine years). He has a BS in Range Management from Humbolt State University.

Cultural Resources

Lawrence A. Kingsbury served as the team specialist for cultural resources on the public lands. His qualifications include experience as an interdisciplinary team member on the Challis Grazing EIS, Little Lost Birch Creek Planning Unit EIS, and the Mountain Foothills EIS. He is an Archaeologist with the BLM (two years) and was a Research Archaeologist with the University of North Dakota (one year). He has a BS from Genesco State University and a MA from Idaho State University in Anthropology/Archaeology.

James A. McDonald served as a team specialist for cultural resources on the Targhee National Forest lands. His qualifications include experience as an interdisciplinary team member on the Targhee National Forest Land Management Plan/EIS. He is a Forest Archaeologist with the Forest Service (eight years) and was an Archaeologist with the National Park Service (three years). He has a BA in Archaeology from Yale University and a MA in Archaeological Resource Management from the University of Arizona.

Mineral Resources

R. David Williams served as the team specialist for mineral resources on the public lands. His qualifications include experience as an interdisciplinary team member on the Dillon Wilderness Plan Amendment/EIS and the Headwaters RMP/EIS. He is a Geologist with the BLM (eight years) and has worked in private industry (three years). He has a BS in Geology from Bates College and a MS in Metamorphic and Igneous Petrology from the University of Montana.

John F. Pruess served as the team specialist for mineral resources on the Targhee National Forest lands. His qualifications include experience as an interdisciplinary team member for the Targhee National Forest Plan EIS. He is a Forester, Minerals with the Forest Service (20 years). He has a BA from Gettysburg College and an MF in Forestry from Duke University.

Social and Economic Conditions

David K. Nelson served as the team specialist for economic and social analysis. His qualifications include experience as an interdisciplinary team member on the Garnet RMP/EIS and Headwaters RMP/EIS. He is an Economist (five years) and Planner (one year) with the BLM. He has a BS in Economics and a MS in Agricultural Economics from Montana State University.

John Ferebauer served as the team specialist for economic and social analysis. His qualifications include experience as an interdisciplinary team member on the Caribou and Targhee National Forest Plan/EISs and the Targhee Geothermal Leasing EIS. He is a Shared Services Economist with the Forest Service (eight years) and has been an Economist with the Idaho Department of Water Resources (five years). He has a BS in Agricultural Economics from the University of Idaho.

Soil Resources

William C. Fanning served as the team member for soil resources on the public lands. His qualifications include experience as an interdisciplinary team member on the Mountain Foothills EIS, Headwaters RMP/EIS, and Headwaters Wilderness Planning Amendment/EIS. He is a Soil Scientist for the BLM (nine years). He has a BS in Soil Science from California Polytechnic State University.

Ken Radek served as the team member for soil resources on the Targhee National Forest lands. His qualifications include experience as an interdisciplinary team member on the Targhee and Tongass National Forest Plans/EISs. He is a Soil Scientist with the Forest Service (nine years) and was with the Soil Conservation Service (three years). He has a BS in Resource Management from the University of Wisconsin.

Preparers of the Final Environmental Impact Statement

The final environmental impact statement was prepared by the individuals listed in Table 5-7.

TABLE 5-7

PREPARERS OF THE FINAL EIS

Function	Unit	Name
Project Manager	BLM	Darrell McDaniel
	Targhee	Bob Williams
	Beaverhead	Sherry Millburn
Reviewers	OEPR	Gary Cummings
	BLM	Gary Pavek
	ARS	Hudson Glimp

APPENDIXES

APPENDIX A
PUBLIC COMMENT

See Draft Environmental Impact Statement

APPENDIX B
MANAGEMENT DIRECTION FOR THE MT. JEFFERSON ROADLESS AREA: BEAVERHEAD NATIONAL FOREST

See Draft Environmental Impact Statement

APPENDIX C
MANAGEMENT DIRECTION FOR THE MT. JEFFERSON ROADLESS AREA: TARGHEE NATIONAL FOREST

See Draft Environmental Impact Statement

APPENDIX D

MINERAL POTENTIAL CLASSIFICATION SYSTEM

As used in this classification, potential refers to potential for the presence (occurrence) of a concentration of one or more energy or mineral resources. It does not refer to or imply potential for development or extraction of the mineral resources. It does not imply that the potential concentration is or may be economic, that is, be extracted profitably.

LEVEL OF POTENTIAL

No Potential

The geologic environment, the inferred geologic processes, and the lack of mineral occurrences do not indicate potential for accumulation of mineral resources.

Low Potential

The geologic environment and the inferred geologic processes indicate low potential for accumulation of mineral resources.

Moderate Potential

The geologic environment, the inferred geologic processes, and the reported mineral occurrences or valid geochemical and geophysical anomaly indicate moderate potential for accumulation of mineral resources.

High Potential

The geologic environment, the inferred geologic processes, the reported mineral occurrences or valid geochemical and geophysical anomaly, and the known mines or deposits indicate high potential for accumulation of mineral resources. The known mines and deposits do not have to be within the area that is being classified, but have to be within the same type of geologic environment.

Not Determined

Minerals potential not determined due to lack of useful data. This notation does not require a level-of-certainty qualifier.

LEVEL OF CERTAINTY

No Evidence

The available data are insufficient or cannot be considered as direct or indirect evidence to support or refute the possible existence of mineral resources within the respective area.

Indirect Evidence

The available data provide indirect evidence to support or refute the possible existence of mineral resources.

Direct Evidence

The available data provide direct guidance but are quantitatively minimal to support or refute the possible existence of mineral resources.

Abundant Evidence

The available data provide abundant direct and indirect evidence to support or refute the possible existence of mineral resources.

APPENDIX E

CHARACTERISTICS OF SOILS IN THE CENTENNIALS STUDY AREA

See Draft Environmental Impact Statement

APPENDIX F

ECOSYSTEM REPRESENTATION

See Draft Environmental Impact Statement

APPENDIX G

MONTANA WILDERNESS STATUS SUMMARIES

See Draft Environmental Impact Statement

APPENDIX H

WILDERNESS MANAGEABILITY

See Draft Environmental Impact Statement

APPENDIX I

TIMBER PRODUCTION POTENTIAL IN THE CENTENNIAL MOUNTAINS

See Draft Environmental Impact Statement

APPENDIX J

WILDERNESS INVENTORY

See Draft Environmental Impact Statement

APPENDIX K

IDAHO WILDERNESS STATUS SUMMARIES

See Draft Environmental Impact Statement

APPENDIX L

BEST MANAGEMENT PRACTICES

See Draft Environmental Impact Statement

APPENDIX M

PUBLIC HEARING TRANSCRIPTS AND COMMENT LETTERS

This appendix contains the complete transcripts of the three public hearings held on the draft Centennial Mountains Wilderness Study and Environmental Impact Statement. Also included are all the public comment letters received during the comment period. Several comments contained duplicate letters signed by different people. Since the letters were identical, only one has been reproduced.

Some letters did not reproduce well. The original letters are on file in the Butte District Office of the BLM and may be reviewed by the public.

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

***

In Regard to a Public Hearing Regarding)
the BLM/USFS Proposal for Wilderness)
Designation and Alternatives in the)
CENTENNIAL MOUNTAINS.)

TRANSCRIPT OF PROCEEDINGS OF HEARING
Helena, Montana
June 2, 1987

BEFORE: James Binando,
Hearing Officer

MR. BINANDO: Ladies and gentlemen, Welcome. This is the first of three public hearings scheduled for the Centennial Mountains Wilderness/EIS. The second will be held in the St. Rose Center, 202 South Atlantic Street in Dillon, Montana, at seven p.m. on June 3rd, and the last at the Eagle Rock Junior High School, 2020 Pancheri Drive, Idaho Falls, Idaho, at seven p.m. on June 4th.

I would like to begin this hearing at this time. The time for the record is 7:05 p.m.. I am Jim Binando and I am on the State Director's Staff of the Bureau of Land Management in Billings, Montana. I will be conducting this hearing. The Court Reporter is Phyllis Yalovich, and she is here to record the proceedings.

The Bureau of Land Management and Forest Service recently completed the Draft Centennial Mountains Wilderness EIS. The document was mailed to all known interested parties on February 16th, 1987.

The Draft Centennial Mountains Wilderness EIS studied an area of 72,826 acres for potential inclusion in the National Wilderness System. Of this total, 21,774 acres are in the current Centennial Mountain Primitive Area administered by the Bureau of Land Management. In addition, there are 4,597 acres of contiguous public land also administered by BLM, 4,474 acres of Beaverhead National Forest in Montana, also contiguous to and adjacent to and

known as the Mount Jefferson Roadless Area, and there are 42,040 acres of Targhee National Forest in Idaho.

The preferred alternative in the EIS document recommends wilderness designation for 26,248 acres of land; 21,774 acres administered by the BLM, and 4,474 acres administered by the Beaverhead National Forest. The remaining 46,637 acres of land identified in the EIS study area are recommended for non-wilderness to be managed as described in Forest Service and Bureau of Land Management Land Use Plans.

This hearing is being jointly held by the Bureau of Land Management and Forest Service in compliance with Section 3(d)(1)(B) of the Wilderness Act of September 3rd, 1964, for the purpose of accepting testimony from anyone who could be affected by the recommendations.

Testimony will be accepted, relevant to the recommendations and analysis set forth in the Draft Centennial Mountains Wilderness Environmental Impact Statement. Testimony which is relevant or related to this document only will be considered. To ensure that everyone has an opportunity to have their testimony heard, I ask that as nearly as possible, your remarks be limited to the recommendations and analysis presented in the document.

I would like to remind you at this time, if you have not already done so, to please register at the door

and indicate if you wish to present a written or oral statement.

All statements received will be analyzed by the Bureau of Land Management and the Forest Service, and the written record of that analysis, as well as the transcripts of the hearing, will be available for inspection at their respective offices in Butte and Dillon, Montana, and St. Anthony, Idaho. If you wish to purchase copies of the transcript of this hearing, please leave your name and address with the Court Reporter. A copy of the hearing record and analysis will be made available to each county involved in the study area, upon request by those county commissioners.

The analysis of the testimony received will be used to determine what changes, if any, will be required in the recommendations set forth in the documents. The analysis of the testimony and a copy of the transcript will be incorporated in the final Environmental Impact Statement and Wilderness Study Reports which will be transmitted to the Secretaries of the Interior and Agriculture, the President, and the Congress. Copies of the final documents will also be made available to all known interested parties following concurrence and signature by the Secretaries of the Interior and Agriculture.

This is a formal hearing and to ensure that all participants have an opportunity to express their views without interruption, there will be no debate, questions or distractions during presentation of testimony. Several Forest Service and BLM officials are present and will be glad to discuss issues with you informally following completion of the hearing.

I would like to introduce those representatives at this time. From the Forest Service, we have Mr. Paul Oakes, who is a Land Use Planning Specialist and he is from St. Anthony, Idaho.

From the Bureau of Land Management, at the rear of the room, we have Carole Mackin, who is the Technical Coordinator on the Centennial EIS; we have Darrell McDaniel, who is a Recreation Planner and Project Manager for the EIS effort; and Mr. Jimmy Lewis, who is an Area Manager with the Dillon Resource Area where a large portion of the study area is included.

These individuals will remain as long as needed after the hearing to discuss issues or answer your questions, and by the way, they have a lot of material at the back of the room if you do want to get into specifics as well as a slide presentation. I want to emphasize that the hearing itself is not a forum for the Bureau of Land Management and the Forest Service to explain or debate their program, but rather this is an occasion for the public to

state, for the record, its observations of the adequacy of the two agencies' work on the Environmental Impact Statement to this point in time.

I will call the names of those wishing to make a statement in the order received. When called, please come forward to this podium and begin by stating your name and whom you represent. If you have a written text, please place a copy on the table by the Court Reporter upon completion of your statement. Those wishing to present written statements only may do so by bringing their text to the table following the oral presentations.

As outlined in the Federal Register publication of March 20th, 1987, which constituted the formal notice of the availability of, and public hearing on, the Draft Centennial Mountain Wilderness Suitability Study and Environmental Impact Statement, individual testimony will be limited to ten minutes.

Are there any questions on procedure thus far? (Silence) If there are none, I would like to begin the testimony of the individuals at this time. Our first individual is Mr. Clifton R. Merritt.

STATEMENT OF CLIFTON R. MERRITT

1A

MR. MERRITT: I am Clifton Merritt, Executive Director of the American Wilderness Alliance.

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The American Wilderness Alliance is a national non-profit organization whose members and staff are working to conserve and promote proper use of the nation's decreasing public wild lands, wildlife habitat and free-flowing rivers.

We have members throughout the United States, including in Montana and Idaho. We also maintain field offices in Bozeman and Boise. Many of our Montana and Idaho members have used and enjoyed as wilderness the Centennials Mountain wild lands under discussion here this evening. As a native Montanan, I have visited the Centennials on a number of occasions and I am familiar with their resources.

I want to thank the Bureau of Land Management and Forest Service for holding hearings on this wild region.

The wild Centennials are truly magnificent--the only undeveloped and unprotected major east-west trending reach of the Continental Divide south of Canada. On the Montana-Idaho border and adjoining the Centennial Valley and the Red Rock Lakes National Wildlife Refuge and Wilderness on the north, they represent an unusually rich array of wild plant and animal life that deserve very special consideration and management.

After careful review of the draft EIS, the American Wilderness Alliance makes the following points and recommendations for change before releasing the final EIS on

1C

this subject:

1. We compliment and support the BLM for proposing 21,774 acres, or over 82%, of the Centennial Primitive Area as wilderness. This is one of the few good features of the EIS.

2. Unfortunately, the U. S. Forest Service has rejected or ignored the opportunity to demonstrate sensitivity and vision commensurate with the rich, irreplaceable wild land and wildlife resources involved--and propose a superb and truly viable 92,000 acre Centennial Mountains Wilderness, as recommended in the Conservationists' Ecosystem Alternative.

A-5

3. The EIS, we feel, is especially deficient in its failure to recommend any wilderness in the Targhee National Forest, despite the fact that, as the EIS reports, the Forest Service plans to keep the 42,040 acre Targhee area within the wilderness study area "essentially undeveloped" and plans "no timber harvest," and even will consider the study area for designation as an "Area of Critical Environmental Concern." The EIS clearly indicates that little operable timber or minerals exist in the wilderness study area so why not recommend wilderness.

F-2

4. The EIS admits that the Centennial wild lands are habitat of the threatened grizzly bear but fails to mention the relationship of these wild lands to the Greater

1D

F-2 cont.

Yellowstone Ecosystem, especially as it affects the grizzly, and to recommend for the great bear and its habitat the wilderness protection they need and deserve.

The Grizzly Bear Study Team concluded that the entire wilderness study area was suitable for grizzly habitat when considered as an integral part of the Yellowstone grizzly population. Protection of maximum wild lands in the Centennials would significantly help the grizzly in its struggle to survive and recover.

F-3

5. The Draft EIS fails to consider and mention the important relationship of the wild Centennials to the Greater Yellowstone Ecosystem in the management and recovery of the threatened grizzly.

6. It also fails to recognize that the Centennial wild lands and the adjoining Red Rock Lakes National Wildlife Refuge and Wilderness and their sensitive wildlife are inseparable, and to recommend an alternative that adequately protects this delicate relationship.

I-4

For example, the rare and indigenous grayling in the Red Rock Lakes spawns in tributary streams within the wilderness study area. The grayling requires high-quality water to survive. Red Rock Lakes and tributaries, along with the Big Hole River headwaters, are the last stronghold of the indigenous grayling south of Canada.

The peregrine falcon nests in the study area and

1E

hunts for prey in the Red Rock Lakes Wildlife Refuge. Protection of its undisturbed habitat in the study area is paramount to survival of the endangered falcon in this wild region.

In fact, protection of the Centennial watershed which drain into Red Rock Lakes is critical to the continued prosperity of the trumpeter swan, for which the refuge was established.

The moose inhabits the wild Centennials. The moose has long been recognized as a wilderness species that does not thrive amidst civilization and development.

The wild Centennials are also home to a herd of three hundred to five hundred elk which migrate between Montana and Idaho. The northwestern part of the Centennial Wilderness Study Area is a vital elk migration and staging area, as well as irreplaceable winter range. But it erroneously has been excluded from the Agencies' wilderness proposal. The elk herd requires protection from off-road vehicle use, road access and other types of development. A wilderness classification offers the best assurance of consistent long-range security for the elk.

O-16

7. The core of the Centennials wild lands is the 16,650 acre Agricultural Research Service Sheep Station. This undeveloped alpine area must be included in a greater Centennial Mountains Wilderness.

1F

8. The Targhee National Forest, which manages the Idaho portion of the Centennials, over fifty percent or 42,040 acres, of the wilderness study area, has failed to propose any of it for wilderness, despite the fact that the Forest Service plans to manage this acreage largely in an undeveloped condition and despite the fact that a wilderness classification under law would best insure that the area would remain undeveloped in the long run. We therefore urge that all 42,040 acres of the Targhee portion of the wilderness study area be recommended for wilderness.

O-7

9. The EIS fails to consider or mention the option of acquiring by exchange the state lands in the wild Centennials and thus consolidating Federal ownership and making feasible a unified, greater Centennial Mountains Wilderness. This must be done in the final EIS.

D-1

10. The EIS fails to mention the importance of preserving the natural integrity of thirty-five miles of the Continental Divide Trail with a wilderness designation for the greater area.

In summary, the American Wilderness Alliance finds the draft EIS on the Centennial Mountains Wilderness inadequate and lacking in major respects, as specifically mentioned, and respectfully calls on the Bureau of Land Management and the Forest Service to revise the Draft EIS to incorporate the recommendations we have made to improve it.

1G

The present EIS clearly shows that the highest and most important values of the spectacular wild Centennials are for sensitive wildlife, critical watershed protection and wilderness.

Our recommendations include the establishment of a magnificent 92,000 acre Centennial Mountains Wilderness, as proposed in the Citizens' Ecosystem Alternative. We call upon the Bureau of Land Management and the Forest Service to take advantage of this one fleeting opportunity to recommend as wilderness one of the finest, wildlife-rich wild lands left in the United States.

Thank you for the opportunity to present this statement.

I also was asked to represent the Northern Rockies BLM Task Force of the Nevada Outdoor Recreation Association and present a short statement.

MR. BINANDO: That would be fine.

MR. MERRITT: And this statement was prepared by Ed Dobson of Missoula, Montana.

2A

I am commenting for the record, on behalf of the Northern Rockies BLM Task Force of the Nevada Outdoor Recreation Association, concerning the BLM and Forest Service "preferred alternative" on the Centennial Mountains Wilderness Draft EIS.

The Nevada Outdoor Recreation Association is the

2B

oldest established non-profit conservation organization dedicated solely to working for the preservation and proper use of the BLM lands.

We support the designation of 21,774 acres of the BLM Centennial Primitive Area as wilderness. However, given the chance to work cooperatively with the BLM in putting together a truly adequate and remarkable proposal for a Centennial Wilderness Area, the U.S. Forest Service unfortunately has chosen to avoid taking the action that would provide best long-range protection and management of the wildlife, watersheds and wild country of the Centennials. The Forest Service has proposed little or no wilderness.

It should be noted that at least six inhabitant species of wildlife requiring remoteness from man and his developments would benefit from a wilderness classification for the greater Centennial area. They are the trumpeter swan, endangered peregrine falcon, grayling, threatened grizzly bear, moose and elk.

F-2

The threatened grizzly bear inhabits a part of the undeveloped Centennials, and its recovery requires retaining the largest possible area in a remote, undeveloped condition.

The endangered peregrine falcon nests in the wild Centennials and hunts for prey in the Red Rock Lakes

2C

F-2 cont.

Wildlife Refuge. Its habitat in both areas must be given firm and continuous protection from the inroads of civilization.

The Centennials and Red Rock Lakes are an integral part of the greater natural ecosystem, and one can't be adequately protected without protecting the other.

O-16

The heart of the wild area is the ARS Sheep Station, managed by the Department of Agriculture. Domestic livestock grazing is allowed under the Wilderness Act. Yet not one acre of the Sheep Station has been proposed for wilderness. This must be changed in the final EIS.

O-7

The EIS fails to consider and recommend a land exchange with the State which would consolidate federal land holdings in the undeveloped Centennials and make possible the establishment of a larger and much more viable Wilderness Area.

Of the 42,000 odd acres of Idaho's Targhee National Forest in the Wilderness Study Area, the Forest Service has failed to recommend a single acre for wilderness. This is intolerable. There are no significant commodity conflicts with a wilderness classification. In fact, the Forest Service indicates its plans are to manage the 42,000 odd acres largely in an undeveloped condition. This can best be assured over the long term with a wilderness designation under law.

2D

For these reasons, the Northern Rockies BLM Task Force respectfully requests that the Centennial Mountains Draft EIS be revised to recommend the following: land exchange and consolidation, then include the consolidated federal lands and ARS Sheep station and add the 42,000 acre Targhee portion of the study area and adjacent suitable federal lands, together with the 26,248 acres of proposed wilderness, for a truly viable and outstanding 92,000 acre Centennial Wilderness Area. In this respect, we agree with and support the Citizens' Ecosystem Alternative.

And I thank you for the opportunity to present these comments.

MR. BINANDO: Thank you, Mr. Merritt. Our next statement will be presented by Mr. Bob Bushnell.

STATEMENT BY BOB BUSHNELL

3A

MR. BUSHNELL: Thank you. My name is Bob Bushnell. I am the President of the Montana Snowmobile Association. I appreciate this opportunity to speak this evening.

I am a native of Montana and have been interested in the opportunities of Montana all of my life.

Closing the areas that have been mentioned in the Centennials is very dear and close to me. Closing these areas to the public use--and for all of us people to enjoy-

3B

is only an interest of the special-interest people that live in this area. We have much use of the area for snowmobiling and we must leave this open for our continued use.

We are encouraged to use this for tourism, which is one of our primary purposes in the State of Montana and if we do not allow this to stay open and continue the, at least, half a million dollar business which presently is there with the outfitters, guides and the other businesses that enjoy our purposes at this time, would be another shut-off of the state of Montana.

The outfitters and guides at the last convention encouraged me to talk to you people about keeping the areas open because they do survive off of the winter business that comes in, by snowmobiling which does not disturb the other wildlife and game management that is in the area.

We support Alternative 3 at this time because the other alternatives do not give us the alternatives and the routes which we have been using for numerous years to access to the property. We wish to continue this area as snowmobiling for all of the State of Montana and the rest of the tourism in the State of Montana.

Thank you.

MR. BINANDO: Thank you, Mr. Bushnell. Our next statement will be presented by Sue Jackson.

STATEMENT OF SUE JACKSON

MS. JACKSON: My name is Sue Jackson, and I am representing the Montana Audubon Council.

The Montana Audubon Council is the state affiliate with the National Audubon Society. It is comprised of nine local Audubon Chapters around the State of Montana, and approximately two thousand members.

The Montana Audubon Council has been studying the EIS for the Centennial Mountains Wilderness Area for the last few months. We have been checking with a variety of experts and trying to gather information of our own in order to determine which proposal for the Centennial Mountains Area we feel is best.

Consultations and discussions have led the Montana Audubon Council to determine that the proposed action, that is Proposal No. 1, offers too little protection for too little area and would result in the loss of not only wilderness acreage but through development, would also cause a loss of wildlife and of wildlife habitat.

Although some of the other proposals recommend increased acreage for wilderness designation, these proposals too, for various reasons do not provide the level of protection the Montana Audubon Council feels the Centennial Mountains Wilderness Area deserves and is worthy of. Therefore, the Montana Audubon Council would like at

this time to strongly recommend to this hearing that Proposal No. 2 be accepted and implemented in the final EIS for the Centennial Mountains.

A few of the reasons for this recommendation that the Montana Audubon Council would like to highlight are: Proposal No. 2 offers the best protection for drainages and the valuable watershed systems in this area. It offers the best protection for bear, elk and moose habitat from logging and other encroachments. It offers the best protection for trumpeter swan and fisheries from increased siltation that would be caused by development as the EIS outlines in some detail.

It is true that the Red Rock Lakes Area is protected by the proposed action, Proposal No. 1, and this is where the trumpeter swans are, but there are other water bodies in the Centennial Mountains area, particularly in the western portion, that are not addressed at all in this proposal. And there are several reservoirs that the Audubon Council would mention, such as Lima Reservoir, which is also an excellent and vital area for waterfowl and it just is not covered in Proposal No. 1.

Also, Proposal No. 2 offers the best protection from an escalation of human encroachment, which is made possible by roads being taken into an area.

It is the feeling of the Montana Audubon Council

that the estimates listed in the EIS for increased employment and economic activity are very, very minimal. There is a very few job difference between Proposal No. 1 and Proposal No. 2 and the Council does not feel that Proposal No. 1 would offer any kind of economic relief for current problems in the area.

In conclusion, the Montana Audubon Council feels that the entire Centennial Valley is worthy of Wilderness designation, which would protect it from development and that this would benefit not only wildlife of all kinds, but also would ensure that people have the enjoyment of a wilderness experience both now and always. So Proposal No. 2 is being strongly recommended by the Montana Audubon Council, which would have 72,885 acres designated as wilderness area.

The Council will submit a written statement before the deadline and we really appreciate this opportunity to comment. Thank you.

MR. BINANDO: Thank you, Ms. Jackson. Our next statement will be presented by Beverly Magley.

STATEMENT BY BEVERLY MAGLEY

MS. MAGLEY: My name is Beverly Magley. I am a member of the Montana Wilderness Association. I am the kind of member who cares enough to support it with money and

occasional short bursts of time and energy. In the case of this Centennials Wilderness issue, I am moved to donate a great deal of time and effort. Simply stated, the Centennials region is unparalleled by any other area in our state. I have hiked or ridden horses into the mountains, explored the refuge, and skied the snows. I return year after year for recreation and rejuvenation. I bring friends, spend money, and I return because of its wilderness and wildlife value.

I received the Centennial Mountains Environmental Impact Statement and would first of all like to compliment you on its quality of readability. It is unusual for an EIS. However, I would like to point out a few discrepancies I couldn't help but notice. My eight years of employment as an editor and proofreader, coupled with four years of training in research and psychology, have made me a fairly observant reader of documents.

Of the fifty-three graphic pictures in the EIS meant to demonstrate some value, fifty-two are of wildlife, of scenics uninterrupted by any development, or of people recreating or using the land non-destructively. Only one graphic shows any development of the scanty timber resource. Now if I were in a clinical psychology situation and had a client who stated one belief, which is, Alternative 1, yet subconsciously through pictures drew fifty-two out of fifty-

5C

three of the very values he professed to destroy of impact heavily, I would suggest that that client needed to rethink his verbal position.

Secondly, your statement of objectives printed on the inside front cover of the EIS would seem to be contradicted by the actual Alternative No. 1 that you chose. If a student in research had submitted this document to me I'd have sent it back with big red slashes on it and directions to rethink the conclusion, based on the evidence presented in the document itself. No scholar could find Alternative No. 1 acceptable, given the initial directives. I quote from your document:

> "...the Department...has responsibility...(which) includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values...and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interests of all our people..."

Pages 72 and 73 of your own document discuss general impacts and cumulative impacts. I quote again directly from your document:

5D

> "...the effect on community stability would be small if the entire study area...were designated as wilderness...the level of grazing will not decrease under any of the alternatives...for most people who use the study area for recreation there will be little change due to wilderness designation...the alternatives...which propose wilderness...have a positive cumulative impact of wilderness values...will preserve the natural character of the environment...add to solitude and primitive recreation values...supply a diversity of natural landform, ecosystem and vegetation...preserves the visual quality...is important for forage...the long-term productivity of the soil will be maintained and erosion and slumping would remain at natural levels... Wilderness designation would maintain long-term resource options...Wilderness designation would have little impact on lifestyles of people living around or visiting the Centennial Mountains. If any alternative proposed in this study other than the all wilderness alternative is selected by Congress, the remaining acreage may be subject to timber harvest; livestock, wildlife and watershed improvement projects; energy and mineral development; and motorized vehicle use. All these

5E

> activities would adversely affect to some degree the study area's naturalness, visual values, and solitude."

Your conclusion, of Alternative No. 1, simply doesn't fit the facts that you, yourself, present in this document.

I find the proposed Conservationist or Citizen's, Ecosystem Alternative the most logical choice, given your own directives on the inside front cover of the EIS. The 92,000 acre wilderness proposal would include the Agricultural Research Station's sheep experimental station, which is, and has been, an integral part of that area and should finally be Congressionally recognized as such. Their operations and research is compatible with wilderness designation. The 92,000 acres recognizes and protects the unique fragility of Red Rock Lakes National Wildlife Refuge and its watershed. It accepts the below-cost nature of timber harvest in that area and saves us taxpayers the subsidizing of that. The Conservationists' Ecosystem Alternative honors and protects the part the Centennials play in the Greater Yellowstone ecosystem. It preserves the archeological potential of the region. The life zones in

F-2

that 92,000 acre proposal range from productive marshlands to alpine tundra and rare or endangered species or species of special interest such as the peregrine falcon, Arctic grayling, trumpeter swan, the grizzly bear, are guaranteed a

5F

cont.

chance in this wilderness.

I urge you to reread and re-evaluate your own document, where evidence and logic mandate the designation of 92,000 acres as wilderness.

Thank you very much.

MR. BINANDO: Thank you, Ms. Magley. Our next statement will be presented by Cedron Jones.

STATEMENT OF CEDRON JONES

6A

MR. JONES: My name is Cedron Jones and I am just talking for myself, representing myself.

I wanted to make comment about three points--two of them relate to the study and one is just about the area itself.

O-16

The first comment about the study is about the omission of the Sheep Station lands from the study. From the management framework plan that is quoted here, Appendix D, page 106, it says: "The very best primitive resource values in the Centennial Mountains are contained within the Sheep Experiment Station boundaries." And then if you look at this map, that's the Sheep Experiment Station, and it is quite clear that it is the central part of the area geographically as well. And so I just don't see how this document can pretend to be a study of the wilderness values in the Centennials without talking about the Sheep Station.

O-16 cont.

I don't know anything about the Sheep Station, and being ignorant of it, it is easy for me to picture it in negative terms, a small bureaucratic enclave whose main goal is to perpetuate itself, and it was abetted in that goal by being recognized as a symbol for sheep ranchers, I guess, by the Federal government in a history that is now gone. But, you know, all of that could have been dispelled had the study talked about the Sheep Experiment Station.

For example, some of the things the study could have done, including the Sheep Experiment Station, would be to document the benefits of maintaining the Station versus the benefits of closing it. Maybe there is a benefit from keeping the Sheep Station open. I am sure those guys would like to have you find that out for them. I don't know about it. I am not sure that it is. It is easy for me to imagine that there is none, not knowing anything about it.

Additionally, the study could have and should have explored alternatives for operating the station under wilderness designation. For example, it could have been an actual boon as being a station to study for wilderness grazing per se--what are the constraints under wilderness grazing? What type of things can you do with grazing in the wilderness?

And so to sum up that comment, I feel that failing to include the Sheep Station means that the study fails to

assess the wilderness potential there and if I were to take that to the logical conclusion, I would say go back and do the whole thing all over again.

M-7

The next comment relates to some points about the economic analysis presented in this document. The presentation, I think, is misleading because each alternative has this table "Economic Impacts of Alternative" and it is a nice big table and if you are used to just glancing at numbers, you will see all these big dollar signs, you know, for Alternative 1, $340,000, and then you go to Alternative 3, which you have $762,000; 38 jobs versus 20 jobs; that kind of thing. The caveats that go with this table are buried back on page 72 in the statement that Ms. Magley just quoted and in the little footnote that says that employment figures are employment potential; no guarantee that this level of employment will occur. And I would like a little more up-front presentation of that kind of data.

The two points being that, first of all, that data is all potential. You won't realize those 22 timber jobs if you don't get budgets to maintain the below-cost sales that are likely to be occurring down there. You won't get the 375 extra AUM's unless you have the budget to put in those range improvements. And what was the other? Well, I forget my other point about that table.

Oh, yes, and then the actual numbers that are

M-7 cont.

used. The economic analysis has been done on too narrow a scope. It is just looking at the Centennials and it ignores other factors. It is like you are looking at a little box and you are not looking at a big enough box to see what is going in and out of that little box.

M-32

In the example of timber, since the sales on the Targhee and the Beaverhead--I don't know particular figures--but forest-wide they are all below cost sales, all below cost. I think the figure that the Wilderness Society quotes is forty-three cents on the dollar returned. I mean we can quibble about numbers, but the idea is that in order to maintain the timber program on the Targhee and Beaverhead forests requires a net infusion of budget dollars. Well, that should be somehow assessed in this document. You just don't simply say there is a twenty-two job timber resource there. That twenty-two job timber resource comes at a cost of a Federal subsidy and we may be willing to make that subsidy but you have to at least put it in the document so that we realize that is the cost for using that timber resource.

M-8

The 8.49 jobs per mmbf figure they used out of implant. That's an old figure. You know, all the trends now are for that figure going down. In other words, as we switch to more mechanized timber harvest practices necessitated by smaller logs, we get much more mmbf per person, so that put it the other way, many fewer people per

M-8 cont.

mmbf, and I would like to see that figure updated and account for trends into the future. That's real pole country down there. You have some big spruce and Doug fir but a lot of that stuff is lodge pole and you should update that figure, the implant figure.

A-1

Wilderness use statistics. The study states that wilderness designation would not produce a long-term increase in recreation use. The only basis I can see for that seems to be a discussion on page 30, under "Projected Visitor Trends" and it says that following designation of the wilderness area in the Refuge in 1976, there was no significant increase in use. But then right under that it gives the figures of recreational use for '81, '82 and '83, and it is not clear if they are talking about entire Refuge use or just wilderness use, but the figures show a six percent increase in '82 over '81 and an eighteen percent increase in '83 over '82. Well, that seems like a pretty significant increase in use to me and maybe there is a contradiction there. And personally I feel like, and this gets back to my comment about you are looking at too narrow a box, if you look at what is going on with wilderness right now in the state, we have a RARE II bill that may or may not come through. One way of looking at that RARE II bill is, okay, it is going to designate "X" more acres of wilderness, one point three if Pat Williams' bill goes through. The

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A-1 cont.

other way of looking at that RARE II bill is that it is going to release for development four million some odd acres of wilderness. Well, most people in Montana don't know the label of where they go. All they know is that there is a roadless resource value out there that they like to use and there have been studies taken or people asked, well, list your ten favorite wilderness areas, and people list ten areas and none of them are designated wilderness. They are all just roadless areas.

So if we resolve the RARE II issue and there is a whole bunch of acres released, then slowly those acres will be developed and the people who want to roadless recreate will be squeezed onto smaller and smaller acreage, and so I think that there will, in fact, be significant long-term increases in wilderness use if the area were designated wilderness; that is, if it did not fall into that pool of lands that is going to become developed.

M-9

And so what I would like to see happen is expand the economic-type analysis to be more like what the Forest Service does with their present net value calculations; that is, check your timber employment rates; factor in timber sales costs, or discuss timber sales costs here; look at the Agency budget issue because that is going to determine whether you will see any benefits from some of these commodity programs; re-look at your wilderness use

6G

M-9 cont.

projections and then put all that together and try and come up with some kind of present net value ranking on these alternatives. And I suspect the all wilderness alternative would come out highest in that.

And then take the step further. I don't know if under BLM, under FLPMA or whatever law you work under you use the same concepts--present net value and net public benefit--but certainly if you were to expand that economic impact table to include all of the factors and come up with something equivalent to present net value and then look at the other, the non-priced benefits that go into net public benefit, such as aesthetics and wildness and water quality and natural diversity and things like that, I think far and away net public benefit would be maximized with an all wilderness alternative.

And then finally, I just wanted to comment about the Centennials itself. Designating the area wilderness would protect the wilderness values found within the WSA and would also protect the aesthetic and natural values of the valley and the water quality of the wildlife refuge.

The study may be correct in stating that the land forms an ecotites of WSA, so they are already well represented within the wilderness preservation system, but that ignores the unique quality of the Centennials WSA, which is its juxtaposition with the valley and with the Red

6H

Rocks National Wildlife Refuge in particular. The two areas complement each other and are, in fact, inseparable, ecologically and spiritually, and several people have mentioned that tonight.

The Upper Centennial Valley is such a special place that if I had my druthers I would start with Long Creek here at the east end of Lima Reservoir and I would designate the whole damn drainage from Long Creek east as primitive area, and by primitive area I don't mean wilderness, I mean a primitive area where people live and work and come to recreate but there aren't any power lines, there aren't any vehicles, there is nothing like that. Otherwise, it is just like wilderness area--no oil and gas leases and stuff like that.

That is pie-in-the-sky obviously, but a good first start, and a good first step towards that would be to designate a 92,000 acre wilderness area and for me personally I don't know, you know, the boundaries of that 92,000 well enough to speak to it per se, but certainly all of the BLM primitive area, the Targhee wilderness area, and most importantly, the Sheep Station ought to be in that wilderness.

That's it. Thank you.

MR. BINANDO: Thank you, Mr. Jones. Is there anyone else wishing to testify? (Silence) Are there any

additional written comments to be submitted? (Silence) Being as there is no indication of further testimony at this time, I will call a recess until nine o'clock, when the hearing will resume.

We appreciate your participation in this portion of the hearing, and let the record show that this hearing was recessed at 7:55 p.m.

(RECESS CALLED AT 7:55 p.m.)

8:10 p.m.

MR. BINANDO: This hearing was opened at 7:05 p.m. today and recessed at 7:55 p.m. The hearing is now re-convened. Let the record show that it is now 8:10 p.m. The hearing was re-convened early to accommodate a presenter who had travelled a long distance to get here and must return back tonight. Our next statement will be presented by Mr. Tom France.

STATEMENT OF TOM FRANCE

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MR. FRANCE: For the record I am Thomas France. I am an attorney with the National Wildlife Federation. The comments I have to make tonight are in behalf of the National Wildlife Federation and its four million members. I will submit additional written comments for the record before the close of the comment period on

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June 19th.

The Centennial Mountains and the Centennial Valley to the north comprise a unique and spectacular area in the American West. From the time one turns off I-15 to the west or crosses Red Rock Pass in the east, a sense of remoteness and wilderness almost assaults the visitor to the Centennials. The east-west configuration of the mountains and valley, the shimmering expanse of the Red Rock Lake marshes, and the diversity and abundance of wildlife from the peaks to the valley floor demand the best in professional resource planning and the highest measure of resource protection.

Because of the great wildlife resource found in the Centennials and the wild country which provides vital habitat, the National Wildlife Federation strongly endorses the adoption of Alternative 2, which is the maximum wilderness alternative. Under this alternative 72,885 acres would be recommended to Congress for inclusion in the national wilderness system. The Federation, however,

O-16

believes that no Centennials Wilderness can be complete without the inclusion of certain lands presently managed by the Agricultural Research Service of the U. S. Department of Agriculture.

It is the opinion of the National Wildlife Federation that both the law and the basic tenets of

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O-16 cont.

professional land management require preparation of a supplemental EIS which considers inclusion of the ARS Sheep Station lands in the Centennial Mountains wilderness. The Federation also believes that a supplemental EIS must address another important shortcoming of the Draft Centennial EIS.

While Alternative 1 with 26,240 acres recommended for wilderness is identified as the proposed recommendation by the BLM, absolutely no explanation is offered as to why this choice was made. Indeed, a review of the EIS leaves one with the feeling that the Agency simply threw darts to see which alternative would be chosen. No reasons are set forth to support the choice of Alternative 1, nor is any justification provided as to why other alternatives were rejected. In order for the National Wildlife Federation, or any other reviewer, to adequately comment on the EIS and the proposed Alternative, insight must be provided as to what factors the agencies relied on in making their choice.

I think it is important to add, too, in this context that a reading of the EIS, while it doesn't provide a formal explanation of why Alternative 1 was selected as the preferred alternative, it does give one a certain sense that perhaps Agency turf was the chief reason why the alternative was selected. Indeed, the Federation must commend the BLM for recommending nearly its entire holdings

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in the Centennials for wilderness designation. We find it a curious situation, indeed, where one Federal agency in examining the wilderness characteristics of land under its jurisdiction can come to the conclusion that virtually its entire land ownings should be recommended to Congress for complete protection under the Wilderness Protection Act, and another Federal agency whose jurisdiction begins just over the hill can look at basically the same piece of ground and come to a completely opposite conclusion, that is, that no acres are worthy of wilderness protection.

Now without some sort of explanation as to how this came to be, it is simply completely arbitrary for the agencies to be recommending the alternative which they are presently endorsing and one which falls far short of the requirements of both the National Environmental Policy Act and the Administrative Procedures Act.

O-16 cont.

We also believe that a major failing of the EIS is the absence of an alternative which includes the Sheep Station lands located in Montana as a wilderness alternative. In this context it is important to remember that the very key to a successful impact statement is an adequate discussion of alternatives. Not only must Congress, as the decision maker, and the public be informed through the DEIS of any alternative that may lessen environmental degradation, the EIS must completely and

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O-16 cont.

thoroughly discuss the consequences of both the proposed action and all reasonable alternatives under the standard of environmental full disclosure that has been found in many Federal courts. To meet this standard we believe the DEIS must raise issues clearly and concisely. Such a detailed statement, to quote one Court, "It helps insure the integrity of the process of decision by precluding stubborn problems or any serious criticism from being swept under the rug."

In the consideration of alternatives the Bureau and the other agencies that prepared the Draft EIS failed to consider Sheep station lands for inclusion. This is at once either a major failing of the present EIS or it represents, as I just quoted, a "sweeping under the rug" of a pressing management issue.

In 1981 Congress placed in the Secretary of Agriculture exclusive jurisdiction of the Sheep Station lands in Montana. The Secretary was not directed as to which Agency should manage those lands and certainly had the discretion under the statute as written, to assign management jurisdiction to the Forest Service. Had the Secretary taken this course of action, the Wilderness Act of 1964 would have required the Forest Service to consider the Sheep Station lands for inclusion in the National Wilderness System. The Secretary's decision to continue management in

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O-16 cont.

the Agricultural Research Station, which has no similar statutory directive by Congress, was in effect, a major Federal action and that decision required preparation of an EIS under NEPA. To simply continue management and thus avoid Congress's directives insofar as wilderness review is concerned, at some juncture in the history of the Sheep Station required preparation of an EIS.

Again, we believe at this point that this problem can best be dealt with by preparation of a supplemental EIS which considers the wilderness characteristics of the Sheep Station land and how various management options might best protect the resources of the Centennials.

We believe that this fact is endorsed by the fact that the Sheep Station lands in Idaho are presently co-managed by the Targhee National Forest and the ARS. These sheep station lands were, in fact, considered for management. There is, again, no reason except an arbitrary decision of the agencies why similar lands located on the other side of the border in Montana were not considered for wilderness study in the present EIS or when the Secretary made the decision to continue jurisdiction under the ARS.

The Secretary's decision to vest management authority in the ARS effectively circumvented the statutory directive and as I say, was thus a major federal action within the meaning of NEPA. Our written comments will

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O-16 cont.

provide legal citations to support this point.

We also believe that the administrative procedures act requires that the Secretary's action not be arbitrary, capricious, or an abuse of discretion. In this context the reviewing court is entitled to review a record of the reasons why the Secretary decided to continue management in the ARS, especially when it had such significant impacts on the wilderness decision.

We have inquired of the Department of Agriculture as to whether such a record of the Secretary's decision exists and have been informed that no such record is present. In such instances the Courts have been unhesitant in finding that the Secretary's actions are arbitrary because there is no written explanation of why a certain course of action was decided upon.

As it was a major federal action affecting wilderness review, an EIS should have been prepared in 1981. While the Secretary made his choice six years ago it is still not too late to reconsider that choice. We believe that this option should be included in a supplemental review of the Centennial Mountains Wilderness.

We have a number of other points that we will make in our written comments. I will touch on a couple of those at this point. We believe that the DEIS contains an

O-7

inadequate discussion of the possibilities of trade or

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O-7 cont.

exchange of BLM and state of Montana lands to provide a better blocking-up of the proposed Centennial Mountains Wilderness. Again we have had conversations with the Montana Department of State Lands and they indicate a high degree of interest to further exchanges in the Centennial Mountains areas. We believe that an alternative that exams the possibilities of rounding out the Centennial Mountains Wilderness is one that fully deserves the attention of the agencies that prepared the DEIS.

Again, we would also suggest that such an alternative be examined insofar as private landowner objections to wilderness designation where they are adjacent to BLM lands.

I think that will conclude my oral presentation and we will submit additional written comments. Thank you for reopening the hearing.

MR. BINANDO: Thank you, Mr. France. Is there anyone else wishing to testify? (Silence)

Being as there is no indication of further testimony at this time, I will call a recess until 9:15 p.m. when the hearing will resume. We appreciate your participation in this portion of the hearing and let the record show that this hearing was recessed at 8:20 p.m.

(RECESS CALLED AT 8:20 P.M.)

9:20 P.M.

MR. BINANDO: The hearing was opened at 7:05 p.m. today, and recessed at 7:55 p.m. The hearing was then reconvened at 8:10 p.m. and recessed again at 8:20 p.m., to reconvene at 9:15 p.m. The hearing is now reconvened. Let the record show that it is now 9:20 p.m.

Is there anyone else wishing to testify?

(Silence)

Are there any additional written statements?

(Silence)

As there are none, this phase of the hearing is over.

Closing the record, I would like to remind you again that the testimony received at this hearing will be available in the form of a transcript, and if you wish to purchase copies, please leave your name and address with the Court Reporter.

You are also reminded that all testimony will be analyzed and a written record of that analysis will be prepared and will be available at the BLM and Forest Service offices in Butte and Dillon, Montana, and at the Forest Service office in St. Anthony, Idaho. The analysis of this testimony will be used to determine what changes, if any, will be made in the EIS and Wilderness Suitability and Nonsuitability Recommendations. The final recommendations will be forwarded to the President following concurrence and signature by the Secretaries of the Interior and Agriculture.

The hearing is now closed: However, the record shall officially remain open until June 19, 1987. The Forest Service and BLM will continue to receive written statements during this period. All such statements postmarked on or before June 19, 1987, will be included in the final decision.

Comments should be sent to the Butte District Office, Bureau of Land Management, P. O. Box 3388, Butte, MT 59702.

We wish to thank you for your time and interest in these issues and for your very candid, informative comments. Time for the record is 9:25 p.m.

(HEARING ADJOURNED AT 9:25 P.M.)

CERTIFICATE

STATE OF MONTANA)
ss.
County of Lewis and Clark)

I, PHYLLIS J. YALOVICH, a Registered Professional Reporter, duly registered by the National Shorthand Reporters Association, and a Notary Public for the State of Montana, do hereby certify:

That I was the duly appointed, qualified and acting reporter for the proceedings reported herein;

That the foregoing pages 1 through 41, inclusive, constitute a true and accurate transcript of my stenographic notes of the hearing held in Helena, Montana, on the 2nd day of June, 1987, in regard to the CENTENNIAL MOUNTAINS WILDERNESS STUDY/ENVIRONMENTAL IMPACT STATEMENT.

I further certify that I am not an attorney or counsel of any of the parties nor a relative or employee of any attorney or counsel connected with the matter, nor financially interested in the matter.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal this 9th day of June, 1987.

(Seal)

NOTARY PUBLIC FOR THE STATE OF MONTANA
Residing at Helena, Montana
My commission expires October 7, 1988

CENTENNIAL MOUNTAINS WILDERNESS STUDY

PUBLIC HEARINGS

June 3, 1987

7:00 p.m.

Dillon, Montana

HEARINGS OFFICER JIM BINANDO, presiding

CANDI NORDHAGEN REGISTERED PROFESSIONAL REPORTER
Conference Room
1100 Utah
3030 Floral Boulevard
Butte, Montana 59701
(406) 494-2083

BE IT REMEMBERED THAT this matter came on for hearing on Wednesday, June 3, 1987, before Hearings Officer Jim Binando.

The following proceedings were had:

HEARINGS OFFICER BINANDO: Good evening and welcome. This is the second of three public hearings scheduled for the Centennial Mountains Wilderness EIS. The first was held last night in Helena, Montana. The last meeting will be held at the Eagle Rock Union High School, 220 Pancher Drive, Idaho Falls, at 7:00 p.m., tomorrow night, June 4th.

I would like to begin the hearing at this time and the time for the record is 7:05 p.m. I am Jim Binando and I am on the state director's staff in the Bureau of Land Management in Billings, Montana. I will be conducting this hearing. The court reporter, Ms. Candi Nordhagen, is here to record the proceedings.

The Bureau of Land Management and Forest Service recently completed the draft Centennial Mountains Wilderness EIS. The draft document was mailed to all known interested parties on February 16, 1987. The draft Centennial Mountain Wilderness EIS studied an area of 72,826 acres for potential inclusion in the National Wilderness System.

Of this total, 21,774 acres are in the current

Centennial Mountains primitive area administered by the Bureau of Land Management. In addition, there are 4,597 acres of contiguous public land also administered by the BLM. Also contiguous there are 4,474 acres of Beaverhead National Forest and 42,040 acres of the Targhee National Forest in Idaho, together known as the Mount Jefferson roadless area.

The preferred alternative in the EIS document recommends wilderness designation for 26,248 acres of land: 21,774 acres administered by the BLM and 4,474 acres administered by Beaverhead National Forest. The remaining 46,617 acres of land identified in the EIS study area are recommended for nonwilderness to be managed as described in Forest Service and Bureau of Land Management land use plans.

This hearing is being jointly held by the Bureau of Land Management and Forest Service in compliance with Section 3(d)1(b) of the Wilderness Act of September 3, 1964, for the purpose of accepting testimony from anyone who could be affected by the recommendations. Testimony will be accepted relevant to the recommendations and analysis as set forth in the draft Centennial Mountains Wilderness Environmental Impact Statement. Testimony which is relevant or related to this document only will be considered.

To insure that everyone has an opportunity to have their testimony heard, I ask that as nearly as possible, your remarks be limited to the recommendations and analysis

presented in the draft document. I would like to remind you at this time, if you have not already done so, to please register at the door and indicate if you wish to present a written or oral statement.

All statements received will be analyzed by the Bureau of Land Management and the Forest Service and a written record of that analysis as well as a transcript of the hearing will be available for inspection at the respective offices in Butte and Dillon, Montana, and St. Anthony, Idaho. If you wish to purchase copies of the transcript of this hearing, please leave your name and address with the court reporter. A copy of the hearing record and analysis will be made available to each county involved upon request by those county commissioners.

The analysis of the testimony received will be used to determine what changes if any will be required in the recommendations set forth in the document. The analysis of the testimony and a copy of the transcript will be incorporated in the final environmental impact statement and wilderness reports which will be transmitted to the secretaries of the Interior and Agriculture, the President and the Congress. Copies of the final documents will also be made available to all known interested parties following concurrence and signature by the Secretaries of the Interior and Agriculture.

This is a formal hearing and to insure that all participants have an opportunity to express their views without interruption, there will be no debate, questions or distractions during the presentations of the testimony. Several Forest Service and BLM officials are present and will be glad to discuss issues with you formally and informally following completion of this hearing.

I would like to introduce those agency representatives at this time. From the Forest Service, we have Mr. Paul Oaks, a land-use planning specialist from the Targhee; we also have Keith Birch, public affairs specialist from the Targhee Forest; and from the Beaverhead Forest, we have Sheri Milburn, the public affairs specialist; from the Bureau of Land Management, we have Carol Mackin, who is the technical coordinator for the project and Darrel McDaniel is the project manager for the Centennial Mountains EIS.

These individuals will remain as long as needed after the hearing to discuss issues or answer your questions. I want to reemphasize that the hearing itself is not a forum for the Bureau of Land Management and the Forest Service to explain or debate their programs, but rather it's an occasion for the public to state for the record its observations of the adequacy of the two agencies' work thus far on the EIS.

I will call the names of those wishing to make a statement in the order received. When called, please come forward to this podium and state your name and whom you represent. If you have a written text, please place a copy on the table upon completion of your statement. Those wishing to present written statements only, may do so by bringing your text up to the table following the completion of the oral testimony.

As outlined in the Federal Register publication of March 20, 1987, which constituted a formal notice of the availability of the public hearing and the draft Centennial Mountains Wilderness EIS Suitability Study and Environmental Impact Statement, individual testimony will be limited to ten minutes.

Are there any questions on procedure thus far?

(No response.)

If not, we will begin with the presentations. Our first statement will be presented by Mr. Wayne Mongomery.

By Mr. Montgomery:

8A Good evening. I have a brief statement that I prepared. I will leave it on the table following my brief remarks.

HEARINGS OFFICER BINANDO: Thank you.

I just want to say that I spent a number of years in the Centennial Valley on the south side, the Centennial Mountains. I raised my family there through their early formative years and have been all over those mountains and know them quite well. I love those mountains. This is the position from which I am coming.

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I would like to read a statement that I've addressed to the Bureau of Land Management through the Department of Interior representing myself, my wife, members of my family and quite a number of my friends, the subject being the Centennial Mountains Wilderness Study/Environmental Impact Statement. My comments are as follows, and this is what is printed here:

I can support the Alternative 7 proposed action with one important qualification: That the Odell Creek Canyon loop trail remain open to snowmobiles where it crosses the very short distance of the proposed wilderness. This is a popular access trail for both snowmobile and cross-country skiing recreation. My wife and I are cross-country skiers and we use this trail to gain access using our snowmobiles to day-use skiing that would otherwise be unattainable.

Alternative 7 is a compromise for the Centennial Mountains Wilderness that recognizes the special interests of our Red Rock Lakes refuge, yet perserves a careful multiple-use management for the balance of that mountain range to the west.

There must be common sense balance to any wilderness proposal or you will further polarize our Montana community with all the economic and social problems that could arise.

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Under any of these alternatives, however, the Odell Creek snowmobile loop route must be retained for those of us who enjoy our recreation in that area of these mountains. There is no plausible or defensible reason to do otherwise.

In closing, I give this statement as one whose family currently owns acreage close to Lakeview, as one whose major recreation time, about 90 percent of it, is spent in the Centennial Mountains and as one who has a pretty good idea of the interests of the majority of the citizens of Beaverhead County. Thank you.

HEARINGS OFFICER BINANDO: Thank you, Mr. Montgomery. The next individual presenting a statement is Mark Simonich.

By Mr. Simonich:

9A Good evening. My name is Mark Simonich. I am a forester for F. H. Stoltze Land and Lumber Company. I am here to speak tonight on behalf of my employer. Stoltze Lumber operates three lumber manufacturing facilities in Montana. They are located in Dillon, Darby and Columbia falls.

The Centennial Mountains are of particular importance to our mill in Dillon. Stoltze Lumber employs 105 people at our mill in Dillon. Additionally, we provide job opportunities for approximately another 50 people through

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M-27

logging contractors.

Analysis done in this Draft Environmental Impact Statement uses a ratio of 8.49 jobs per million board feet of timber harvested. Based upon this, then a harvest of 2.64 million board feet per year would support 22 jobs. This 2.64 million board foot harvest is based on no wilderness in the area.

If the proposed action is implemented, the draft statement says we can expect to lose 17 jobs in timber and one additional job in recreation, or rather lose the potential of 18 jobs in the future. The draft statement also says that no alternative discussed in this document would by itself cause closure of local mills or create large layoffs.

This whole train of thought is a little flawed. In reality, adjusting your timber base or your annual harvest a little one way or the other doesn't really have the effect of increasing or decreasing five or ten jobs locally. The local timber operators simply have to shift some operations to another area to maintain the same timber supply. This works as long as there is an overall adequate supply of timber.

However, in order to really analyze the effect on local jobs that designating a wilderness might have, you have to take a broad look at the entire timber supply for the affected area. This Draft Environmental Statement did not do this. This document did not take into account that the

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M-27 cont.

Beaverhead National Forest plan calls for a 34 percent reduction in timber harvest on national forest lands during the next ten-year period, nor did it analyze the possibility of making up the difference of that reduction on other federal, state or private lands.

The combination of lower harvest on national forest and BLM lands and additions to the National Wilderness System will cause closure of a local mill. The cumulative effect of these actions on the part of the Federal Government will cause over 100 real jobs to be lost to the local economy, not just the 18 potential jobs referred to in this document.

In this document, discussion of each of the eight alternatives compared the amount of annual income to the local economy sustained from all economic activities within the study area to the amount of income not realized in relation to the no wilderness alternative. Of the eight alternatives, four showed a positive net economic contribution ranging from $590,092 per year to $762,762 per year in the no wilderness alternative. Conversely, four alternatives showed a negative net economic contribution. These range from a minus $74,032 per year to a minus $492,618 per year in the all wilderness alternative.

Interestingly, the proposed action, Alternative No. 1, was one of the four showing a negative economic impact. It is absolutely ludicrous that any government agency would

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M-27 cont.

select a proposed action that, by their own standards, will have a negative economic impact upon a local community when they have available to them alternatives that will provide for some positive economic impacts.

The discussion of economics in this document is severely lacking. No where in the document is there any discussion of the cost to the Federal Government to designate and/or manage the proposed area for wilderness. Likewise, there is no discussion of the potential loss of revenue to the federal treasury due to not allowing timber harvest on 10,200 acres of suitable timber land being placed into wilderness. This document has completely ignored any loss in revenues to Beaverhead County and to the State of Montana due to taking lands out of production and placing it in wilderness.

There is a standing inventory of commercial timber in the study area of 128.5 million board feet. Ninety percent of this timber is in the mature sawtimber class and should be harvested. According to the BLM Framework Management Plan, timber harvest was planned on 13,200 acres in the study area at the rate of 1.64 million board feet per year. This would merely be harvesting growth and would not be reducing the actual standing inventory.

M-27 cont.

Under the proposed action, timber harvest will be reduced by 77 percent due to 10,200 acres of suitable timberland being put into wilderness. We will be foregoing

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M-27 cont.

the opportunity to harvest 99.3 million board feet of timber. Our mill in Dillon must have 26 million board feet of timber each year in order to be able to continue to operate at the current level. The proposed action in this document will not allow the Dillon resource area, the BLM, to meet their annual harvest. The Beaverhead National Forest is only planning to sell 17.3 million board feet per year through the next decade. We are depending on the BLM to work to achieve their full potential of an annual harvest of 4.5 million board feet.

This document refers to the highly erodible nature of the soils in the study area. It suggests any development of the area will increase slumping, erosion and sedimentation. This document claims that logging and associated road building would adversely affect on-site and off-site fish and waterfowl habitat. However, these problems can be mitigated with the use of best management practices during road building and logging.

Even in the proposed action, the document says that all naturally occurring slumping, erosion and sedimentation would probably continue to occur. Instead of allowing this to happen, you, the Government, the land managers, should recommend no wilderness for this area. The no wilderness alternative will allow you the opportunity to actively manage the area and use soil stabilization projects to reduce sedimentation and improve water quality.

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You paint a picture in the document that any development, logging and road billing in particular, will result in a decrease of the elk population. You also say that elk hunting opportunities may be lost in Montana. We are dealing with an interstate transitory herd that by nature of its migrational habits will often be moving from the study area to their wintering grounds during hunting season.

To place the blame of lost hunter opportunities onto logging and Development is inappropriate. At the worst, logging may temporarily displace some elk in the immediately adjacent drainages. But there is no evidence to link logging to actual reduction in elk numbers. Actually, development of the study area may lead to increased hunter opportunities by improving access into the area.

In this document, there is discussion of wilderness diversity, both landform and ecotype. The discussion points out that the study area is included in the Northern Rocky Mountains Lanform Type 401. There are already 17 representatives of this landform type in the National Wilderness Preservation System totaling over 6.9 million acres. The Centennials are also included in the Rocky Mountain Forest Ecosystem. There are already several representatives of each ecotype found in the study area in the National Wilderness Preservation System. The Centennial study area simply is not unique.

9G

We currently have 17 wilderness areas covering 3.4 million acres in the State of Montana, with proposals to add more than another million acres. There is no need to turn the Centennials into wilderness. Under the no wilderness alternative, 82 percent of the study area will continue to be managed as roadless and will maintain basic wilderness values. The no wilderness alternative will continue to provide an adequate supply of primitive recreation opportunities as well as providing for increased access, grazing, timber harvesting and opportunities to control and reduce erosion and sedimentation.

We therefore oppose the selection of Alternative 1 as a proposed action and we fully support the selection of Alternative No. 3, the no wilderness alternative.

Thank you.

HEARINGS OFFICER BINANDO: Thank you, Mr. Simonich. Our next presenters are Mike Mosolf and Al Luebeck.

10A

By Mr. Mosolf:

I am speaking for Al Luebeck, chairman of the Beaverhead Forest Concerned Citizens from Butte, Montana, who is at a meeting in Helena tonight and can't make it. I am speaking for myself in the second statement. I'm Mike Mosolf, 720 Kentucky in Bilings, Montana. The first statement is from Al Luebeck.

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I am pleased to represent the concerns of Beaverhead Forest Concerned Citizen relative to the future of the remarkable Centennial Mountains and wildlands. BFCC has many members who hunt, fish, ski, tour, backback, view wildlife and otherwise enjoy the spectacular Centennial/Red Rocks country. BFCC began more than a decade ago as a local conservation group dedicated to the protection and sensitive management of public lands in southwest Montana.

O-16

After having reviewed the Draft Environmental Impact Statement, I find it ironic we cannot support any of the eight alternatives presented. Scarcely mentioned, let alone considered, is the very heart of the Centennials wildlands along the Continental Divide, the 16,650 acre Sheep Experiment Station. This high, subalpine country interconnects with all of the other jurisdictions within the Centennials: BLM, Forest Service and several State of Montana sections.

They DEIS is seriously deficient by not considering the high wilderness potential of the this core area. The 1981 transfer of jurisdiction over the sheep station from BLM to the United States Department of Agriculture did not and does not prohibit wilderness consideration of this vital wild area.

In order to safeguard the threatened grizzly, the endangered peregrine falcon and many other wildlife species, and the pristine watershed of the Red Rock Lakes National Wildlife Refuge, BFCC strongly endorses the Conservationist

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Ecosystem Alternative from a 92,000 acre Centennial Mountains Wilderness. The State sections should be acquired through land exchange and the several low standard vehicle ways within the wilderness study area should be closed and allowed to rehabilitate to a wilderness condition.

Adoption of the Ecosystem Alternative would remedy two other serious shortcomings in the minimal agency recommendation for protection of only 26,000 acres of already secure lands within the BLM Primitive Area and Beaverhead National Forest Hellroaring Creek Further Planning Area.

A key part of the Greater Yellowstone Ecosystem would be protected. Secondly, the contiguous Targhee Forest roadless land on the Idaho side of the Divide would receive protection in its own right and would buffer the steeper, more erodible Montana portion of the Centennials. All of these undeveloped roadless lands are part of irreplaceable habitat for large interstate herds of moose and elk.

Resource conflicts are minimal. For example, the marginal timber grows on steep, highly erodible slopes where the cost of the development and mitigation would far exceed the value of timber harvested. Conversely, significant economic benefits would accrue to the local economy over time through the Wilderness designation of presently undeveloped lands in the.

In closing, we urge true interagency cooperation

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between the BLM, Forest Service, USDA Agricultural Research Service for a more comprehensive approach to management of the Centennials complex. In so doing, the fragmented proposal to protect as wilderness less than one-third of the Centennials wildlands will be discarded in favor of managing the entire 92,000 acre wild area for its unequalled wildlife, watershed, and wilderness values.

We request this statement be included in the official hearing record. Thank you, Al Luebech.

11A

My statement: I wish to make it known as a matter of public record that I recommend 92,000 acres of the Centennial Mountains be wilderness.

M-32

The BLM study acknowledges that much of this wilderness study area contains highly erodible soils. The combination of below cost timber sales in southwestern Montana and Idaho and the high erodible soils in this WSA should make timber harvest a nonissue. The diverse wildlife, the stable watersheds and the wildlands deserve wilderness protection.

I would also like to make it known as a matter of public record that I suppport livestock grazing in the wilderness study area. It was reported that BLM director, Robert Burford, has urged the livestock industry to be vigilant against attempts to make more public land wilderness and national parks.

He was quoted as saying to the stock growers, "We

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can't let those who want to lock up all the land prevail all the time."

I hope that this is not the attitude of the land managers who serve under Oirector Burford and I hope they will not be intimidated by the timber industry and livestock industry.

HEARINGS OFFICER BINANDO: Thank you, Mr. Mosolf. Our next speaker is Tom Breneman.

By Mr. Breneman:

12A

I'm Tom Breneman, co-owner of the Breneman ranch. I have no problems with having a wilderness area in the Centennial Mountains, but I do have three reservations about

O-7

it, the first being we have an irrigation reservoir on one of the State sections which has been proposed to be traded to the BLM. We need the access to be able to control that irrigation reservoir.

The second is I would like to see a snowmobile corridor through the Odell Creek. After watching what happens on other wilderness areas in the valley, we see that the bureaucrats are able to use motor vehicles on wilderness areas but no one else. Those are my concerns.

HEARINGS OFFICER BINANDO: Thank you, Mr. Breneman. The next statement will be presented by Michael J. Lyngholm.

13A

By Mr. Lyngholm:

My name is Michael Lyngholm. I am the resident manager at Stoltze Lumber. I'm of the belief that voluminous speeches do not make a point any more than a short one, so I'll try to keep this pretty short.

Our mill in Dillon needs the timber out of the west end of this area from Matsingale on west, in particular. There is timber in the other portion of the wilderness area, but our main concern is the west end. Our mill is in my belief about a third of the economy of Oillon. The town would be severely impacted if we were gone.

I'm opposed to this as a wilderness area, also, on the grounds as a forester and having worked in the area, because it's too narrow, too broken up to be an effective wilderness area unless the Sheep Experiment lands are included. I believe that battle has been fought in the past and would have to be brought up again in Congress, because I believe it's a Congressional decision it not be included and be kept for study and research on sheep grazing.

Another reason I'm opposed to this area as wilderness is because of the current trend that would tack on a few more thousand acres to existing wilderness every few years and they seem to keep expanding. The Bob Marshall is still expanding, the Pintlars are still expanding. We keep tacking them on and tacking them on. I'm opposed to another

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area being started in this process and continuing on. Thank you.

HEARINGS OFFICER BINANOO: Thank you, Mr. Lyngholm. Our next speaker is John Kirkley.

14A

By Mr. Kirkley:

My name is Jack Kirkley. I live in Oillon and I represent Pintlar Audubon. I chose western Montana to be my home because of the quality of life found here. For me an important part of that quality of life is the wild character of this land. To me, this is literally the place where the deer and the antelope play, the place where the eagles and hawks continue to sore in abundance and where sometimes, if you're lucky, you have a chance to glimpse a coyote, mountain lion or even a bear in the wild or rather than in the captivity of a zoo.

I am rather proud to say I live in a place where cows outnumber people and I am encouraged to know that so many of my fellow Montanans share my appreciation for the tremendous natural heritage we have in our mist. The benefits we gain are sometimes as tangible as a big, fat brown trout on the end of your line or as intangible as that nagging daydream that one of these days I'm going to get around to climbing that mountain just to satisfy my curiosity of what it looks like from up there. Sometimes it's enough just knowing there

14B

are wild places I've have never explored or deep pools I I have yet to cast my a fly. Just knowing that these places are out there helps me cope with the day-to-day routine of my life and my job.

My message, then, is simply that I want Montana to stay the same now, ten years from now, even centuries from now. After all, we're not the only ones that should have a chance to enjoy the wildness of Montana. But you know the world is changing so rapidly that I am not sure how long Montana can continue to escape the pressures of a growing, materialistic society hungry for energy, water, wood and other resources.

Having lived in and traveled through many other parts of the United States, areas where the wild places are practically all gone, I can't simply take for grant that this region will always provide the wild opportunities we enjoy today.

How do we insure that our way of life is protected? I read recently that about 90 percent of the land in Montana is either developed or in some way unsuitable to serve as wilderness. Of the remaining 10 percent with wilderness potential, only 3 percent of Montana is currently protected as either national parks or as designated wilderness. So these wilderness hearings only concern the fate of certain portions of that remaining 7 percent of Montana that has so far escaped

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development. How much development in these remaining lands will serve the long-term best interests of Montana?

Our wildlands are not only a resource that brings us enjoyment, but there also a type of resource trust fund that will continue to benefit our economy by attracting tourists and potential new residents to our state. Hunting, fishing and other forms or tourism bring yearly dividends to this area in increasing amounts each year with no end in sight. On the other hand towns of Bannack, Virginia City, and Anaconda, stand as mute testimony to the short-lived profits realized by most ventures in mineral extraction in this area.

What about the future value of forestry resources? Anyone who has seen the lush, fast-growing forests of the Pacific Northwest or even those in northwestern Montana should be struck by the stark contrast with the dry, slow-growing forest in this region.

Clearly, our future prosperity cannot rest upon a marginal timber industry. In the long run, the timber in this area is more valuable as standing forests which shelter big game herds and other wildlife while also maintaining watershed values important to both the anglers and the farmers. Agriculture and tourism are clearly our best bets for long-term prosperity, and both are best served by leaving our remaining wildlands wild and undeveloped.

The Centennial Mountains in their present wild

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condition provide for these traditional values. The portion north of the Divide also is crucial as a watershed for the Centennial Valley which holds the valuable Red Rock Lakes Wildlife Refuge, the last major stronghold of the trumpeter swan and home to an abundance of game and non-game species.

The Centennials also form the westernmost arm of the Greater Yellowstone Ecosystem, forming a vital link between that region and the mountains of the Continental Divide which form the backbone of this region.

For these reasons I support the protection of the Centennials as a wilderness area. As the current president of Pintlar Audubon, I believe I also speak for many of our members in urging that the majority of the wilderness study area be protected from further development and misuse by conferring upon it the wilderness status.

O-16

As a professor of biology, I feel it is unacceptable to draw wilderness boundaries based on political rather than ecological considerations. For instance, I see no reason to end a wilderness at the Montana-Idaho line merely because different governmental agencies have jurisdiction on either side of that line, nor do I agree with the designation of a wilderness fragmented by huge inholdings such as the Sheep Experiment Station, unless those areas are also managed in a manner consistent with wilderness values.

I should like to emphasize that wilderness status

14E

would allow the continuation of sheep grazing on the experiment station and on other existing allotments so long as those activities follow wilderness guidelines. While it is important to protect the bulk of the Centennials as wilderness, I also favor minor boundary adjustments that minimize conflicts with wxisting existing uses and which provide some motorized access through the use of the "cherry stem" techniques mentioned in Alternative 2.

We owe it to future generations of Montanans to see that the long-term best interests of Montana are served. The wild Centennials like a trust fund will continue to pay dividends for decades to come. Development could destroy those long-term values in the name of short-term profits for a few. I hope my fellow Montanans will appreciate the concept that wilderness protection represents unselfish investment in the future of Montana in helping to protect the quality of life we now treasure. Thank you.

HEARINGS OFFICER BINANDO: Thank you, Mr. Kirkley. Our next statement will be presented by Lucy M. Hayden.

15A

By Ms Hayden:

I grew up in the area close to the Centennial Valley and put in six years of what is now the wildlife refuge there. I have been acquainted with that area for about 70 years. The timber is growing, there is more timber in the area now than

15B

there was when I can first remember it. Trees that were trees like this in 1936 are now saw log size.

I think that this timber when it matures should be harvested and allowed to replace itself and the Forest Service has done an excellent job of controlling that in the places they have allowed cutting to be done and the manner in which it is carried out, to make it to where we don't have it fall down and burn, but to where it can regrow.

And also in some places, I don't know of anything in that area there of mineral development that should take place, but I am opposed to any more wilderness anywhere. I think our taxpayers' money could be better spent handling it on a multiple use basis efficiently as the Forest Service and BLM have done so far, a very good job in my estimation. Thank you.

HEARINGS OFFICER BINANOO: Thank you, Mrs. Hayden. Our next statement will be presented by Linda Ellison.

16A

By Ms. Ellison:

My name is Linda Ellison and I represent the Montana Trail Bikeriders Association. We support your decision not to recommend the entire Centennial area for wilderness; however, as a representative of many sportsmen across the state, I feel you are missing the boat.

In your preferred alternative, recreation

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opportunities will be provided in the semiprimitive motorized category. While you are emphasizing your intentions to manage the nonwilderness lands for wildlife habitat and fishery concerns, you seem to be overlooking the fact that the much-mentioned ORV degradation you are attempting to address is directly tied to that wildlife resource. You are not seeing the forest for the trees.

Your environmental impact statement asserts that much of the ORV damage is the result of illegal hunting and fishing. Well, illegal or not, doesn't this perhaps suggest a need that's not being met? With the dwindling base in the semiprimitive motorized category of lands available for recreational use because of the amount of lands tied to other wilderness proposals, what you are really doing here is pushing the problem off and onto some other land manager or other lands elsewhere.

Montana Trail Bike Riders Association does not believe this document has fully addressed this issue. Wilderness is not an island unto itself and neither are other resources and uses. We would like to see some ORV use continue with appropriate environmental safeguards and control measures. We emphatically feel you need to take a closer look at the recreation picture in the Centennials.

HEARINGS OFFICER BINANDO: Thank you, Mrs. Ellison. Our next speaker is Jane Stanisich.

17A

By Ms. Stanisich:

I represent myself as a citizen of the State of Montana. The Centennial Mountains and Red Rock Refuge are a national treasure. The area has been regarded and prized by citizens of the nation as a splendid example of what caring and hard work can accomplish in the conservation movement. The management of the refuge has succeeded in securing the trust of the conservation and preservation sector. It is not an easy job. Holding the line against encroachment is difficult. The pressures mount year by year as seen in many areas of the country such as the Bob Marshall area. It is time to hold the line against piecemeal development: The division of areas into developed sections.

Once the beauty of the fragile high country is disturbed, the total picture changes. It can never be reclaimed and restored. Clearcuts remain that were made 25 years ago, road cuts and ruts remain and last. So does the Oregon Trail, the ruts are still there. Soils are eroded, speeded up by disturbances. Millions of dollars are spent by the Federal Government in reclamation projects in this country.

How much longer can we be expected to pay tax dollars in a bale-out of some irresponsible private enterprises who disregard the stewardship of the lands and

17B

water and air? It isn't affordable now to hire personnel to police the actions, especially in distant areas. The headlines tell us every day of the mistakes and calculated risks taken that cannot be rectified.

The private interests in the natural resource area always seem to be dollar values. There are many other considerations to be made. The Department of the Interior, the BLM, has a responsibility of protecting the natural resources. It is mandated that any development of these resources be in the interest of all the people and the very best we can do is the stewardship of these resources.

Let us develop a real land ethic in preserving the solitude, wildlife, water, birds and plants of natural beauty. Let's save the Centennials.

HEARINGS OFFICER BINANDO: Thank you. Our next speaker is Barry Reiswey.

18A

By Mr. Reiswey:

My name is Barry Reiswey and I'm the manager of the Red Rock Lakes Wildlife Refuge. I am making this statement on behalf of the United States Fish and Wildlife Service. The United States Fish and Wildlife Service has reviewed the Draft Environmental Impact Statement for the Centennial Mountains Wilderness Study Area.

As you are well aware, the Red Rock Lakes National

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Wildlife Refuge, an integral unit of the National Wildlife Refuge System, will be critically influenced by the future management of lands in the Centennial Mountains Wilderness Study Area. We have the following comment to offer.

Overall, the continued viability of the Centennial Mountains Wilderness Study Area is critical to the future of many species of wildlife and fish, and for aesthetic and amenity values on the Red Rock Lakes National Wildlife Refuge.

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Indeed, to many wildlife species, the two areas are utilized as one contiguous block of habitat. Elk and moose freely move between the areas as their needs dictate. Other species such as the great gray owl are dependent on the old-growth timber on the refuge and adjacent WSA as primary habitat.

The Centennial Valley, of which the Centennial Mountains WSA is an integral part, is considered by the Nature Conservancy to be one of the most biologically complete areas remaining in Montana.

The overriding resource which sustains this enormous diversity of life is a continuous supply of clean, high-quality water, most of which is produced annually in the Centennial Mountains. Wetlands in the Centennial Valley, off the refuge as well as on, are highly productive of waterfowl such as trumpeter swans, geese and ducks. Accelerated

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siltation of Red Rock Creek, Centennial Valley wetlands or Lima Reservoir through ill-planned development of the Centennial Mouintains would have disastrous consequences for waterfowl and other species dependent on wetland habitats.

Lima Reservoir is especially important for that waterfowl. It is the most importand molting area for trumpeter swans and Canada geese in the Rocky Mountain west. Any further degradation of this already shallow reservoir would have negative impacts on waterfowl values.

F-1

Endangered species such as the peregrine falcon and bald eagle, which are nesting species in the Centennial, are dependent on waterfowl produced in valley wetlands as a primary food source. The valley is also the most important nesting area for greater sandhill cranes in the state of Montana.

I-4

In addition, Red Rock Creek provides habitat for Arctic grayling, a native fish, which has been designated as "species of special concern" by the Montana Department of Fish, Wildlife and Parks. The grayling are found only in Red Rock Creek and in the Big Hole River as natives in the Continental United States. The species is critically dependent on high-quality riparian habitat and clean water for survival.

The quality of the watershed at the present time is extremely fragile. The Centennial Mountains possess highly

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erodible soils perched on unstable slopes. Even in their natural condition, some slumping is presently occurring. Past mining, roading and sheep grazing in the Odell Creek watershed adjacent to the WSA have dumped thousands of tons of silt into the Upper and Lower Red Rock Lakes. This soil movement has had a significant negative impact on the refuge's aquatic system. Protection of the watershed is absolutely critical to the future productivity of the refuge and wetlands in the Centennial Valley.

The protection of big-game security cover throughout the WSA is also extremely important. The Centennial Mountains provide a long, narrow band of big-game habitat located in the two adjoining states. Disturbance to this habitat reduces security to the animals and encourages movement across state lines to avoid hunting pressure, which reduces recreational values to users on both sides of the State line.

G-1

The movement of big game such as moose and elk is common from the highlands of the refuge throughout the WSA in both Montana and Idaho. Any major disturbance to security cover by logging and roading existing habitats may have a negative impact on these big-game animals' use of the refuge. The connection of the WSA to the existing Red Rock Lakes Wilderness has positive impacts on both units from an aesthetics standpoint. The refuge has been designated a national natural landmark by the Department of the Interior in

18E

addition to its wilderness status. A portion of the refuge adjacent to WSA in the Sheep Mountain area is also designated a Research National Area. It is in our view that the scenic and aesthetic qualities of the WSA be maintained to complement the aesthetic and amenity values of the refuge.

After a review of the DEIS, we feel the preferred alternative gives basic protection to refuge values, although it falls short of protecting the watershed areas for migratory bird habitat in the western end of the Centennial Range. The values of Lima Reservoir are significant on a regional basis from a trumpeter swan and goose stantpoint. The maintenance of the reservoir's entire watershed is critical to its future, not only to migratory birds, but to agriculture as well as.

Overall, the Fish and Wildlife Service supports the implementation of the preferred alternative to protect the multitude of values arrayed in the Red Rock Lakes National Wildlife Refuge.

We appreciate the opportunity to comment, and the agency will forward a written statement to you in the next couple weeks.

HEARINGS OFFICER BINANDO: Thank you, Mr. Reiswig. Our next statement will be presented by David Hartwell.

19A

By Mr. Hartwell:

Good evening, I am representing the Conservation

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Endowment Fund. We own property in the Centennial Valley. We have been working since 1983 to preserve the Centennial Valley in its entirety, to keep it as it is for the wildlife in the grazing that currently takes place there.

I first visited the Centennials in 1977. I have the opportunity to serve on various local and national boards of directors for environmental causes. And in my experience, I have not seen anything like the Centennial Valley, which has not yet been really chopped apart and harmed. We have taken on since 1983 the project of preserving the valley as it is. Part of that means the wilderness area in question.

Without that wilderness area, the work that we have done would not be significant. We would recommend the proposal Alternative 2 plus the Sheep Experimental Station in State lands for a of total of 92,000 acres and feel to protect the entire valley, that's very important. I'm not an expert. You're going to hear from experts, you have heard from experts. I know it's a very unique place and urge it to be protected as it is.

HEARINGS OFFICER BINANDO: Thank you, Mr. Hartwell. Our next speaker is John Taft.

20A

By Mr. Taft:

Good evening, my name is John Taft. I'm the owner of the Centennial Ranch which fronts this proposed wilderness

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for about two and a half miles on both sides of Odell Creek and have been there for about 17 years or at least run out on the property about 500 head of cows and calves to various neighboring ranchers over the years. What I find a little alarming in this report is that you people went to a great deal of expense and effort to create this EIS.

O-16

What I saw, there was a complete void when it came to mentioning that sheep station that joins us on the south. There are many thousands of acres in that sheep station and it's in the prettiest, more valuable wildlife country that I think there is along that Continental Divide. The country should have certainly been looked into and has to be looked into before you can make a complete, thorough report to the public.

That sheepshed station has been overgrazed over the years about as bad as anything I've ever seen and the sheepmen that come in there work for the Government. But I guess the sheep, much of it is privately owned, these flocks.

The country is not taken care of at all. It's because of this that this has to be looked into. You can't put an area like this in the middle of a proposed wilderness area. When I first arrived there in 1970, I was met at the gate by a BLM man who was very adamant in requesting us to give him, give the Government a right-of-way through that country in order that they could make a road from the Odell

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Creek completely through this entire area, opening it up to logging and opening it up to road hunters. Of course, we didn't oblige them in that request, but that was the intent of the Government and really the push at that time.

Then a few years later, low and behold to my amazement I was notified that the Secretary of the Interior was going to arrive in a day or two and they were going to have a big dedication there of a wilderness area behind the place. They asked if the Secret Service people would be allowed to come in and get everything all set up for this fancy meeting. That kind of disappeared, because I guess there was some opposition at that time from certain timber companies and other interests. So that thing disappeared in the spur of the moment.

It just seems like every few years it changes. Then all of a sudden the president of the United States was going to come through and bring his family because there was noplace that he could find the kind of wilderness quality they were looking for, and they had quite a hubub over that and we were ready for that to occur, and that kind of gave out.

What we're seeing here is every few years some change occurring in the attitudes from the people who own this land. This can just swing back and forth, depending who is in office and who is running the show. What we would like to see happen here is -- this area is really unique.

20D

I have been on vacation, we just flew in the other day. I haven't flown into Bozeman before and hadn't seen this part of the country from the airplane. I was amazed at seeing how much of Montana is being chopped up and logged that I think it would absolutely knock you people for a loop if you could get up in an airplane and see what's happening. I was greatly surprised.

And the Centennial Mountain area is very unique. It's not a place that you can duplicate often, it's not a place that you could certainly look, go somewhere else and see again.

So just as a person there who is a resident, an owner of land, I want to say that that wilderness, some sort of a wilderness has to be put in. If you're saying the 26,000 acres is going to be a solution and give people what they want, it won't be, because 26,000 acres, in the way I look at it on the map, are all hillsides. You're not giving the public anything. There shouldn't be anybody opposing that 26,000 acre affair because it's all those steep slopes.

If you started timber or put roads in, it would just cause an awful lot of expense that wouldn't be worth the trees and would cause a great deal of washing and dirt washing and other detramental things occuring.

So actually, if you're going to preserve this country, you've got to go into that Alternative 2. And

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H-1

Indeed, to many wildlife species, the two areas are utilized as one contiguous block of habitat. Elk and moose freely move between the areas as their needs dictate. Other species such as the great gray owl are dependent on the old-growth timber on the refuge and adjacent WSA as primary habitat.

The Centennial Valley, of which the Centennial Mountains WSA is an integral part, is considered by the Nature Conservancy to be one of the most biologically complete areas remaining in Montana.

The overriding resource which sustains this enormous diversity of life is a continuous supply of clean, high-quality water, most of which is produced annually in the Centennial Mountains. Wetlands in the Centennial Valley, off the refuge as well as on, are highly productive of waterfowl such as trumpeter swans, geese and ducks. Accelerated

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The protection of big-game security cover throughout the WSA is also extremely important. The Centennial Mountains provide a long, narrow band of big-game habitat located in the two adjoining states. Disturbance to this habitat reduces security to the animals and encourages movement across state lines to avoid hunting pressure, which reduces recreational values to users on both sides of the State line.

G-1

The movement of big game such as moose and elk is common from the highlands of the refuge throughout the WSA in both Montana and Idaho. Any major disturbance to security cover by logging and roading existing habitats may have a negative impact on these big-game animals' use of the refuge. The connection of the WSA to the existing Red Rock Lakes Wilderness has positive impacts on both units from an aesthetics standpoint. The refuge has been designated a national natural landmark by the Department of the Interior in

18E

addition to its wilderness status. A portion of the refuge adjacent to WSA in the Sheep Mountain area is also designated a Research National Area. It is in our view that the scenic and aesthetic qualities of the WSA be maintained to complement the aesthetic and amenity values of the refuge.

After a review of the DEIS, we feel the preferred alternative gives basic protection to refuge values, although it falls short of protecting the watershed areas for migratory bird habitat in the western end of the Centennial Range. The values of Lima Reservoir are significant on a regional basis from a trumpeter swan and goose stantpoint. The maintenance of the reservoir's entire watershed is critical to its future, not only to migratory birds, but to agriculture as well as.

Overall, the Fish and Wildlife Service supports the implementation of the preferred alternative to protect the multitude of values arrayed in the Red Rock Lakes National Wildlife Refuge.

We appreciate the opportunity to comment, and the agency will forward a written statement to you in the next couple weeks.

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19B

Endowment Fund. We own property in the Centennial Valley. We have been working since 1983 to preserve the Centennial Valley in its entirety, to keep it as it is for the wildlife in the grazing that currently takes place there.

I first visited the Centennials in 1977. I have the opportunity to serve on various local and national boards of directors for environmental causes. And in my experience, I have not seen anything like the Centennial Valley, which has not yet been really chopped apart and harmed. We have taken on since 1983 the project of preserving the valley as it is. Part of that means the wilderness area in question.

Without that wilderness area, the work that we have done would not be significant. We would recommend the proposal Alternative 2 plus the Sheep Experimental Station in State lands for a of total of 92,000 acres and feel to protect the entire valley, that's very important. I'm not an expert. You're going to hear from experts, you have heard from experts. I know it's a very unique place and urge it to be protected as it is.

HEARINGS OFFICER BINANDO: Thank you, Mr. Hartwell. Our next speaker is John Taft.

20A

By Mr. Taft:

Good evening, my name is John Taft. I'm the owner of the Centennial Ranch which fronts this proposed wilderness

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for about two and a half miles on both sides of Odell Creek and have been there for about 17 years or at least run out on the property about 500 head of cows and calves to various neighboring ranchers over the years. What I find a little alarming in this report is that you people went to a great deal of expense and effort to create this EIS.

O-16

What I saw, there was a complete void when it came to mentioning that sheep station that joins us on the south. There are many thousands of acres in that sheep station and it's in the prettiest, more valuable wildlife country that I think there is along that Continental Divide. The country should have certainly been looked into and has to be looked into before you can make a complete, thorough report to the public.

That sheepshed station has been overgrazed over the years about as bad as anything I've ever seen and the sheepmen that come in there work for the Government. But I guess the sheep, much of it is privately owned, these flocks.

The country is not taken care of at all. It's because of this that this has to be looked into. You can't put an area like this in the middle of a proposed wilderness area. When I first arrived there in 1970, I was met at the gate by a BLM man who was very adamant in requesting us to give him, give the Government a right-of-way through that country in order that they could make a road from the Odell

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Creek completely through this entire area, opening it up to logging and opening it up to road hunters. Of course, we didn't oblige them in that request, but that was the intent of the Government and really the push at that time.

Then a few years later, low and behold to my amazement I was notified that the Secretary of the Interior was going to arrive in a day or two and they were going to have a big dedication there of a wilderness area behind the place. They asked if the Secret Service people would be allowed to come in and get everything all set up for this fancy meeting. That kind of disappeared, because I guess there was some opposition at that time from certain timber companies and other interests. So that thing disappeared in the spur of the moment.

It just seems like every few years it changes. Then all of a sudden the president of the United States was going to come through and bring his family because there was noplace that he could find the kind of wilderness quality they were looking for, and they had quite a hubub over that and we were ready for that to occur, and that kind of gave out.

What we're seeing here is every few years some change occurring in the attitudes from the people who own this land. This can just swing back and forth, depending who is in office and who is running the show. What we would like to see happen here is -- this area is really unique.

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I have been on vacation, we just flew in the other day. I haven't flown into Bozeman before and hadn't seen this part of the country from the airplane. I was amazed at seeing how much of Montana is being chopped up and logged that I think it would absolutely knock you people for a loop if you could get up in an airplane and see what's happening. I was greatly surprised.

And the Centennial Mountain area is very unique. It's not a place that you can duplicate often, it's not a place that you could certainly look, go somewhere else and see again.

So just as a person there who is a resident, an owner of land, I want to say that that wilderness, some sort of a wilderness has to be put in. If you're saying the 26,000 acres is going to be a solution and give people what they want, it won't be, because 26,000 acres, in the way I look at it on the map, are all hillsides. You're not giving the public anything. There shouldn't be anybody opposing that 26,000 acre affair because it's all those steep slopes.

If you started timber or put roads in, it would just cause an awful lot of expense that wouldn't be worth the trees and would cause a great deal of washing and dirt washing and other detramental things occuring.

So actually, if you're going to preserve this country, you've got to go into that Alternative 2. And

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preserving it means the way I see it, opening it. Of course the hunters are still using it. It's still a wonderful area that can be set aside for decades to come.

I have kind of a hobby of kind of looking at the tree rings. This lady who spoke a moment ago saying she was there in 1936 when the trees were this little and they're all big trees now, there is a mistake. I counted rings in the trees in the Northwest Forest, great big red firs the timber people cut down and counted 165 to 175 rings in them.

A tree up there in this proposed wilderness area was hit by lightening a few years ago and some neighbors came in and chopped that thing up for firewood this winter. We sat there and counted 225 rings on a little thing that's no bigger than this right here, half the size of 160 rings.

These trees grow awful slow. When you allow someone to come in and cut down and strip timber as we see happening all over this state when you get up in an airplane, these trees are gone for everybody's lifetime that's here now, gone are the elk and gone are the other values that people really like to see in this country. So as far as I'm concerned, we've got to request a new EIS that will take in this sheep station. When this wilderness thing comes up for real vote and real discussion, we've got to make sure that's included and that the timber that's taken off of this, what the value of it is and how many human generations will pass before that

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thing can even closely be replaced. Thank you.

HEARINGS OFFICER BINANDO: Thank you, Mr. Taft. Our next speaker is Louisa Willcox.

21A

By Ms. Willcox:

Hi, my name is Louisa Willcox. I'm the program director for the Greater Yellowstone Coalition Organization based in Bozeman, a group that is committed to the preservation and protection of the Greater Yellowstone Ecosystem. This 14 million acre region including parts of Montana, Idaho and Wyoming, that is centered in Yellowstone and Grand Teton National Parks, we're an organization of about 50 member organizations as well as approximately 1400 individuals all committed to this purpose.

I would like to take a minute to acknowledge that Ed Louis, the executive director of the coalition, is here with us tonight and a number of our members as well. A member organization of the Wilderness Society mentioned, although they were unable to attend this hearing tonight, that they would be submitting testimony on the Environmental Impact Statement.

I would like to thank the BLM for the candid and readable and clear report. Having waded through a lot of other reports that are filled with jargon you can scarcely understand, this is a refreshing change. The background of

21B

the Greater Yellowstone Coalition's involvement in the Centennials has been fairly deep for several years now.

About a year and a half ago, we started a seven month project. Approximately ten individuals were involved representing soil scientists and wildlife biologists, people from the Montana National Heritage program all looking and taking a deep look at the Centennials Mountains and Centennial Valley area, looking at the relationships of the plants and animals and geology and climate and a host of other factors that we will be discussing in detail in a written comment that we will be submitting on the Environmental Impact Statement.

Tonight I would like to make a short set of comments concerning our major interests, the ecological integrity of Greater Yellowstone. From our standpoint, the wilderness issue is critical to protecting the Centennials portion of the Greater Yellowstone Ecosystem. It will take all 92,000 acres as recommended wilderness to sufficiently protect this ecosystem. The 26,000 as recommended in the plan simply is not enough to insure the protection of the species that define the diversity of the greater Yellowstone.

We don't need to talk in superlatives. You live near Yellowstone, you know about the geisers and the grizzlys. And we've got the last intact populations of grizzly. You know about all this stuff. I would like to talk about diversity, that is a greatly misunderstood area. In the

21C

O-16 plan itself it said that the Centennials area does not significantly add to the diversity of the Greater Yellowstone Ecosystem because Doug fir, spruce and subalpine fir and other plant communities were represented elsewhere. I would like to point to the fact this definition is simply not the complete definition of diversity. It does not include the species diversity or genetic diversity which is also critical to the protection of any ecosystem, not just greater Yellowstone, any ecosystem, anywhere in the world.

F-2 The Centennials in particular is critical to the maintenance of species and genetic diversity in Greater Yellowstone for a lot of reasons. It is critical to the protection of a number of endangered species. Grizzlys have been noted in this area. There is a number of sightings as you are probably well aware of. This may be a critical area for grizzlys, particularly in years of drought were they're pushed out of the core area in Yellowstone.

I-1 It's a critical area for, as Barry and others have mentioned, Trumpeter swans. Already we know that the habitat that is here now in the Greater Yellowstone Ecosystem may not be sufficient to protect the Trumpeters. We already have a very limited situation.

If their habitat is further fragmented by road building, logging and other development, we could effectively eliminate the Trumpeter swan from Greater Yellowstone. Also

21D

F-1 the peregrine falcon, this is the only successful nesting site in Montana. But this is questionable depending on what happens in the surrounding area, surrounding wildlands of the Centennials. F-6 Eagles, too, this is considered according to the Greater Yellowstone Bald Eagle Working Group as a critical area to nonbreeding bald eagles. We've seen a large number of eagles up here and a large concern that eagles may be wiped out depending on what happens to their habitat should this area not be designated in its entirety as wilderness. F-7 Wolves have been sighted in this area. We don't have a population here, that's the only species that at present is not in Greater Yellowstone. The only area that has any hope of having a natural reintroduction is in an ecosystem that is effectively an island any more, a biographic island in a sea of development.

This is the only neck of wild country that connects Greater Yellowstone to any other large roadless areas, the river of no return country in Idaho. This is only hope for any population expansion or movement between this ecosystem and adjacent, not exactly adjacent, but the one to the west of us.

For that reason, it is critical. It is critical to the plants. Even rare and unique species have been identified here as Barry said. Bob Doran, a noted botonist, noted 487 species and 243 genera and 65 families representing 21

21E

percent of the plants in the State of the Montana in the Centennials. It is an area of high bird diversity, 255 bird species, 5 species of owls alone; 28 of the 43 species of waterfowl nest in this area. This is a critical area for diversity.

Fish, to name a few, this is the only area as I think you've been hearing earlier where the arctic greyling still exist, a species of special concern as we have said.

It is important that we have a wilderness designation that encompasses and protects the core of Greater Yellowstone. That is not the case in this wilderness or recommendation which in some areas has as thin little pieces no more than 60 acres across, a thin little neck if you will, not sufficient to protect all of these species that we've been mentioning.

The story of what happened and has happened in Greater Yellowstone is the story of habitat destruction and fragmentation. This island may be not adequate as we now know to correct this ecosystem, but we have time, we still have an opportunity and this wilderness recommendation will be an important part of that action to protect the Greater Yellowstone. To put Greater Yellowstone in prospective and compare it to other national parks in this country and looking at some extinctions that have occurred elsewhere; for instance, Yosemite National Park. For the Greater

21F

Yellowstone, because of a lot of different factors and people who have cared as well as the national park, that is 2.2 million acres, we have only one extinction, but that is so far.

We have time here but things are going fast. This Environmental Impact Statement in particular fails to recognize the worldwide and nationwide pattern of habitat fragmentation and destruction.

A-5 There is no doubt that this area meets all of the wilderness criteria, all of the criteria under the Wilderness Act, all 92,000 acres of it: The size criteria, the naturalness criteria, the primitive recreation, the opportunities for primitive recreation, solitude criteria, the manageability criteria. The Targhee National Forest, which manages the Idaho side of the Centennials and over half of the study area, did not recommend a single acre for wilderness. This land also meets all the criteria.

It is our sincere wish that these lands will be included in the revised Environmental Impact Statement and will have a positive effect on a number of species: Elk, grizzly, wolverine, lynx, great grey owl, goshawk, shark-skinned hawk, Coopers hawk, golden eagle, long-eared owl, and prairie falcon and have positive effects on the Red Rocks Lakes Refuge, the values of which we discussed earlier.

The fact that this area may not be designated as

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wilderness will have adverse effects. This is documented in the Environmental Impact Statement, too, that logging, road building, will have negative impacts on the fishery resource on Red Rock Lakes

This is clearly documented, this is discussed at length by the Montana Fish, Wildlife & Parks that they are very concerned about the fact of roading and any reduced security cover on elk. It's well documented that the range condition has been declining and will continue to decline further if something is not done about this. This can be cured if the area is recommended and designated as wilderness.

The lake as we've discussed has lost 60 percent of its capacity through erosion from phosphate mining, logging, roading and grazing. This does not have to continue. We can protect the swans, protect the refuge, the areas up river are protected as wilderness. The plants, too, are vulnerable with logging, roading and grazing.

Some of these plants that are considered rare and protected are in the heart of the areas that are going to be logged and roaded in the future. We'll see if this area is not designated, the whittling away around it to the point where 26,000 acres is not going to mean much. Twenty-six thousand acres is not going to mean much as wilderness and is not going to do much for the surrounding areas such as Red Rock. Therefore, we are recommending that the entire area be

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designated as wilderness, that there be a number of revisions in terms of the revised Environmental Impact Statement to include the protection, thorough protection of all the endangered species that were mentioned in the study, and monitor the impacts of other activities around the area. We can assess the cumulative impacts on the species in this portion of the Greater Yellowstone, to allow opening to timber and roading activities that are compatible. Some of these are very unstable slopes and do not allow heavy equipment to move across the slopes that will further exacerbate the problem.

The area that BLM already recommended in 1979 be included as an area of critical environmental concern be designated to protect all the things BLM recognized then were problems, watershed, dangered species and diversity.

We thank you for the opportunity to comment and we will be submitting written comment as well. Thank you.

HEARINGS OFFICER BINANDO: Thank you, Ms. Willcox. Our next speaker is Dan Heinz.

22A By Mr. Heinz:

My name is Dan Heinz. I'm here representing the American Wilderness Alliance. Any decision for allccation of public lands must be able to demonstrate a net public benefit. We must challenge this draft EIS figures that show an economic

22B

M-32 benefit flowing from the large acreages of wilderness or removed from wilderness category for logging purposes. The Centennials are a below-cost timber area; that is, it takes more public funds to develop the area for logging than the logging can possibly return to the treasury. The annual income projected from timber removal is in error since it shows cash benefits without deducting losses.

M-28 In addition, suitable timberland do not include the costs of doing business. Neither does the draft deduct the cost to recreation and wildlife in aesthetic resources caused by logging activities. The draft EIS does correctly state damage will occur to wildlife and recreation resources but further analysis is needed. The draft must value these losses and include them in a cost benefit analysis. The decision cannot be made from the best possible land allocation here without an objective analysis of all costs as well as the benefits of the various alternatives.

HEARINGS OFFICER BINANDO: Thank you, Mr. Heinz. Our next speaker is Joan Montagne.

23A By Ms. Montagne:

My name is Joan Montagne from Bozeman. I am offering the following comment on behalf of the Montana Wilderness Association. The times I have spent in the Centennial Valley and Mountains either visiting or helping

23B

with research have been some of the highlights of my life.

The Centennial Valley is a national treasure, a jewel that has remained mostly undiscovered and undisturbed until this time. The Centennial Mountains are a magnificent wilderness that have also survived the pressures of development. Lack of human disturbance has enabled wildlife such as the Trumpeter swan to survive where it has been eradicated in the rest of the nation. The Centennial Mountains are an integral part of the Red Rocks Valley. This valley is certainly one of the last great undisturbed valleys in this nation. High altitude and physical isolation have limited year-round human habitation to a few hearty ranchers and their families.

The Montana Wilderness Association supports wilderness for the Centennial Mountains as the only way to protect the Centennial Valley. The highly unstable soils of the Wilderness Study Area cannot withstand roading and logging. Because of the harsh climate, the timber values in these mountains are very low. The Red Rocks Lake have experienced tremendous increased siltation since the 1950's. Numerous fish and waterfowl are dependent on their lakes for their very survival. O-16 We urge the BLM to also consider the sheep experiment permit station for wilderness designation. Large portions of these lands are not vital for the operation of this station. We believe that the donut hole effect of

23C

leaving this area out of wilderness is detramental to the overall health of the Centennial Mountains. Thank you.

HEARINGS OFFICER BINANDO: Thank you, Ms. Montagne. Our next speaker is Joe Helle.

24A By Mr. Helle:

I feel like a stranger in my own community. Looking out here I see a lot of strange faces, a lot of people that don't make their living in this area, that don't have their homes in the Centennial Valley or Beaverhead - Madison County. I am a rancher here representing the Montana Wool Growers Association, National Wool Growers Association and also the Stock Growers Association of Montana and national.

We are opposed to the addition of any more wilderness areas. We are opposed to the wilderness designation of the Centennial Valley. We are opposed to the inclusion or the attempted inclusion of the Experiment Station into this Wilderness Study Area. The wilderness or the Sheep Experiment station has been in effect for many, many years. It's a vital part of the western range sheep industry and we will oppose it very heartily to the inclusion of any wilderness designation.

It's kind of ironical to listen to some of you people talk about the values of wilderness in this area and the habitat and wildlife and habitat of grizzly bears and

24B

threatened and endangered species including the possible wolf and also the impact to the Greater Yellowstone Coalition, that this area is necessary, and Centennials is necessary for the inclusion.

Isn't it ironical that this area has got all these values you talk about and it has evolved through over a hundred years of grazing, over a hundred years of management, livestock management?

You have your values that have evolved through livestock operations in the valley. It's one of the oldest livestock values in the west. We feel that the values that are there, sure, they should be enjoyed by people. They have been enjoyed by people. I enjoy going to the Centennial Valley. I enjoy seeing the variety of birds, the variety of different animals there, but they're there because they have evolved through the operation and correlation between the livestock industry and what the necessary needs of the wildlife are.

We don't have to designate that area as a wilderness. We still have the values there as wilderness. It can be managed under multiple use as it has in the past. Man does not create wilderness by designation. There has been an attempt over the years to draw circles around all the mountaintops in Montana and Idaho, Wyoming, as potential wilderness areas.

24C

We do not create wilderness areas. Wilderness areas are wilderness in such because they're there. We have wilderness, we have areas of vast acreages that are true wilderness areas. We do not need to come in and encircle all these little small parts and mountain peaks and say this is necessary for continuation of wilderness.

I think the gist of the whole thing is that the livestock industry in this area and in the national industry is against inclusion of any more areas into the Wilderness System. We feel that under multiple use, these areas, if they do have wilderness characteristics, can be enhanced and enjoyed by all under the multiple-use concept. Thank you.

HEARINGS OFFICER BINANDO: Thank you, Mr. Helle.

I have several cards in my hand where the hearing participants were not certain about testifying when they entered the room here the last hour or so. I will call out the names now and offer the individuals the opportunity to make a statement or a final decision. Clark Scott.

25A By Mr. Scott:

I was born and raised in this country. The way the Centennial is, I have been up there since I was a kid. It hasn't changed, we don't need this wilderness up there. I snowmobile up there, I have road bikes up there, I've walked up there. We need to be able to use this country. If you get

25B

up there and make it a big wilderness, you're worried about the timber, you have a fire, you let it burn. What's that going to do? There, all the silt goes into your lakes, kills your fish. We need it the way it is. The Forest Service, BLM, they have done a good job of managing it. I think we better leave it alone.

HEARINGS OFFICER BINANDO: Thank you, Mr. Scott. Kevin Rush.

26A By Mr. Rush:

I live right in the middle of this area and what I have seen, I would have to recommend Alternative No. 2 because I've seen some clearcuts that have been there as long as I can remember and there is just not much regrowth yet. My only

B-3 opposition to this is I would like to see a snowmobile route through Odell that's only open after hunting season to stop the hunters from harassing the game, as this is the only route through the entire range which is accessible and gets a lot of traffic at the present and I would like to see that continue. Thank you.

HEARINGS OFFICER BINANDO: Thank you, Mr. Rush. Fred Missbuechler. Mr. Missbuechler does not wish to testify. Karl Diedrich.

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By Karl Diedrich:

I have something I want to put in the form of a question. On the Forest Service and BLM road travel --

HEARINGS OFFICER BINANDO: Could you state your name and who you represent?

I'm Karl Diedrich. I'm representing myself as a concerned citizen. This yellow area on this map, the road travel plan map, is designated as a No. 1 in a circle, which designates all of this area as roadless or closed to motor travel, except motorcycles in the summer, except snow machines in the wintertime, correct?

HEARINGS OFFICER BINANDO: I'm not in a position to answer that question.

MR. DIEDRICH: If you have one of these maps, I'll show you. What I want you to do is distinguish what's the difference between the No. 1 road closures and the wilderness.

HEARING OFFICER BINANDO: Mr. Diedrich, there is an opportunity to discuss the ramifications of what the information is in the impact statement and our land use plan. There is an opportunity to discuss that and be clarified with our agency representatives as we've indicated earlier. At this point in the EIS statement, it's your interpretation of the adequacy of the document and raising any questions. We will not debate or discuss the document at this time. Thank you.

Is there anyone else wishing to testify this evening? Is there any additional written statements that you wish to be submitted?

Being as there is no indication of further testimony at this time, I will call a recess until 9:00 p.m., when the hearing will resume. We appreciate your participation and candid information during this portion of the hearing. Let the record show that this hearing was opened at 7:05 p.m. today and recessed at 8:40 p.m.

(Whereupon a brief recess was taken, after which the following proceedings were had:)

The hearing is now reconvened. Let the record show that it is now 9:00 p.m.. At this point I would like to request is there anyone else wishing to testify or make comment on the Centennial Mountains Wilderness EIS document? Is there any additional written statements?

As there are none, this phase of the hearing is over. In closing the record, I would like to remind you again that the testimony received at this hearing will be available in the form of a transcript and if you wish to purchase copies, please leave your name and address with the court reporter. You are also reminded that all testimony will be analyzed and a written record of the analysis will be prepared and will be available at the BLM and Forest Service offices in Butte and

Dillon, Montana, and the Forest Service office in St. Anthony, Idaho.

The analysis of this testimony will be used to determine what changes if any will be made in the EIS and wilderness suitability and nonsuitability recommendations. The final recommendations will be forwarded to the president following concurrence and signature by the secretaries of the Interior and Agriculture.

The hearing is now closed; however, the record shall remain officially open until June 19, 1987. The Forest Service and BLM will continue to receive written statements during this period. All such statements postmarked on or before June 19, 1987, will be included in the final decision. Comment should be sent to the Butte District Office, Bureau of Land Management, Post Office Box 3388, Butte, Montana, 59702.

We wish to thank you for your time and interest in these issues and for your very candid and informative comment. The time for the record is 9:05 p.m. Thank you very much, ladies and gentlemen. And again, if you have any questions you wish to direct to the agency representatives, please feel free to do so. They will be here as long as you feel it's important or have questions or issues. Thank you.

* * * * *

CERTIFICATE

STATE OF MONTANA)
: ss.
County of Silver Bow)

I, Candi Nordhagen, Registered Professional Reporter-Notary Public in and for the County of Silver Bow, State of Montana, do hereby certify:

That the hearing was then taken at the time and place herein named; that the hearing was reported by me in machine shorthand and later transcribed by computer, and that the foregoing fifty-three (53) pages contain a true record of the proceedings, all done to the best of my skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this _____ day of June, 1987.

____

Notary Public for the State of
Montana residing at Butte,
Montana. My commission
expires September 15, 1989.

(NOTARIAL SEAL)

PUBLIC HEARING ON THE BLM/USFS PROPOSAL FOR WILDERNESS DESIGNATION AND ALTERNATIVES IN THE CENTENNIAL MOUNTAINS

* * *

June 4, 1987
7:00 P.M.

Eagle Rock Junior High School
2020 Pancheri Drive
Idaho Falls, Idaho

* * *

Jim Binando - Hearing Officer
Paul Oaks - Land Use Planning Specialist
Keith Birch - Public Affairs Specialist
Tim Kimball - Recreation/Lands
Carole Mackin - Technical Coordinator
Darrell McDaniel - Project Manager

Reported by:
Karen Konvalinka, C.S.R.

EASTERN IDAHO COURT REPORTERS
P.O. BOX 853
IDAHO FALLS, ID 83402
529-0222

PROCEEDINGS

HEARING OFFICER: Ladies and gentlemen, good evening, and welcome. This is the last of three public hearings scheduled for the Centennial Mountains Wilderness EIS. The first was held in Helena, Montana on June 2nd, and the second in Dillon, Montana on June 3rd, 1987. I would like to begin this hearing at this time. The time for the record is 7:05 p.m.

I am Jim Binando, and I am on the State Director's staff of the Bureau of Land Management in Billings, Montana. I will be conducting this hearing. The Court Reporter, Karen Konvalinka, is here to record the proceedings.

The Bureau of Land Management and Forest Service recently completed the Draft Centennial Mountain Wilderness EIS. The draft document was mailed to all known interested parties on February 16, 1987.

The Draft Centennial Mountain Wilderness EIS studied an area of 72,826 acres for potential inclusion in the National Wilderness System. Of this total, 21,774 acres are in the current Centennial Mountain primitive area administered by the Bureau of Land Management. In addition there are 4,597 acres of contiguous public land also administered by the BLM.

Also contiguous, there are 4,474 acres of Beaverhead National Forest in Montana, and 42,040 acres of the Targhee National Forest in Idaho, together known as the Mount Jefferson Roadless Areas.

The preferred alternative in this EIS document recommends wilderness designation for 26,248 acres of land; 21,774 acres administered by the BLM, and 4,474 acres by the Beaverhead National Forest. The remaining 46,637 acres of land identified in the EIS study area are recommended for nonwilderness to be managed as described in Forest Service and Bureau of Land Management Land Use Plans.

This hearing is being jointly held by the Bureau of Land Management and the Forest Service in compliance with Section 3(d)(1)(B) of the Wilderness Act of September 3, 1964, for the purpose of accepting testimony from anyone who could be affected by the recommendations.

Testimony will be accepted relevant to the recommendations and analysis set forth in the Draft Centennial Mountain Wilderness Environmental Impact Statement. Testimony which is relevant or related to this document only will be considered to ensure that everyone has an opportunity to have their testimony heard, I ask that, as nearly as possible, your remarks be limited

to the recommendations and analysis presented in the draft document.

I would like to remind you at this time, if you have not already done so, to please register at the door if you wish to present a written or oral statement.

All statements received will be analyzed by the Bureau of Land Management and the Forest Service, and the written record of that analysis, as well as the transcripts of the hearing, will be available for inspection at their respective offices in Butte and Dillon, Montana, and St. Anthony, Idaho. If you wish to purchase copies of the transcript of this hearing, please leave your name and address with the Court Reporter. A copy of the hearing record and analysis will be made available to each county involved in the study area, upon request by those County Commissioners.

The analysis of the testimony received will be used to determine what changes, if any, will be required in the recommendations set forth in the documents. The analysis of the testimony and a copy of the transcripts will be incorporated in the final Environmental Impact Statement and Wilderness Study Reports which will be transmitted to the Secretaries of the Interior and Agriculture, the President, and Congress. Copies of the final documents will also be available to all known interested parties following concurrence in signatures by the Secretaries of the Interior and Agriculture.

This is a formal hearing, and to ensure that all participants have an opportunity to express their views without interruption, there will be no debate, questions, or distractions during presentation of testimony. Several Forest Service and BLM officials are present and would be glad to discuss issues with you informally following completion of this hearing. I would like to introduce those agency representatives at this time.

From the Forest Service we have Mr. Paul Oaks, a Land Use Planning Specialist; Keith Birch, Public Affairs Specialist; and Tim Kimball, a Recreation and Lands Assistant.

From the BLM we have Carole Mackin, who is a Technical Coordinator of the EIS Project; and, Darrell McDaniel, who is Project Manager for this effort.

These individuals will remain as long as needed after the hearing to discuss issues or answer your questions. I want to re-emphasize that the hearing itself is not a forum for the Bureau of Land Management and the Forest Service to explain or debate their programs, but rather an occasion for the public to state for the record its observations of the adequacy of the

two agencies' work thus far on the EIS.

I will call the names of those wishing to make a statement in the order received. When called, please come forward to this podium and begin by stating your name and whom you represent. If you have written a text, please place a copy on the table upon completion of your statement. Those wishing to present written statements only may do so by bringing your texts to the table following completion of the oral testimony.

As outlined in the Federal Register publication of March 20, 1987, which constituted a formal notice of the availability of and public hearing on the draft Centennial Mountain Wilderness Suitability Study and Environmental Impact Statement, individual testimony will be limited to ten minutes.

Are there any questions on procedure thus far?

I would now like to call upon Ruth Gale to present her statement.

27A

RUTH GALE: My name is Ruth Gale, and I'm speaking as an individual wildlife biologist who studied trumpeter swans in the Centennial Mountains for the last ten years.

I would like to comment on the draft Centennial Mountain Wilderness Study/Environmental Impact

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Statements and request that the following concerns be addressed in the analysis during the preparation of the final document.

The draft EIS does not address the importance of the Centennial Mountains to the long-term survival of wildlife populations in the Greater Yellowstone Ecosystem.

As our society searches for effective strategies to ensure the conservation of wildlife in the next century, we must be aware of long-term trends. Globally and nationally, the acreage of wild lands will continue to shrink, and many of our wildlife populations will become dependent upon islands of wild lands, literally surrounded by a sea of human development. Without careful planning, these islands will be inadequate for the survival of many species over the long term. The key to maintaining minimum viable populations in the coming decades will be to ensure the preservation of habitats that will be both large enough to support adequate numbers of individuals of each species and maintain genetic diversity to ensure long-time species survival.

Finding techniques to minimize the gradual fragmentation of wildlife habitat and the gradual genetic isolation of wildlife populations from each other poses

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a major challenge to resource managers. These are not merely academic challenges. The loss of species due to habitat fragmentation has already occurred across much of our nation. Planning for the future management of the Centennial Mountains must recognize this issue and the unique role the Centennial Mountains will play.

The Centennials form an east-west bridge, both geographically and biologically, between the heart of the Greater Yellowstone Ecosystem and the remaining wild lands of Central Idaho and the Idaho-Montana boundary area. As human uses and development proceed to fragment and shrink these wild areas, the Centennials will become increasingly important as a wildlife travel corridor, a biological bridge, preventing the genetic isolation of wildlife populations in the Greater Yellowstone Ecosystem. While our resource agencies are more used to discussing the traditional targets and recreational opportunities, it is essential that they do not fail to address these larger questions of ensuring the long-term health of fragmented wild lands.

Wilderness designation greatly increases the chances that the Centennial Mountains will continue to function as a biological bridge in coming decades. Thus it is crucial that the public be aware of what types of managements would occur if these lands were released from

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wilderness designation and made available for resource development of various kinds. The draft EIS states that even without wilderness designation, no timber harvest will occur on the wilderness study lands within the Targhee National Forest. That's on Page 11. And the reader is referred to the Targhee National Forest Land Use Plan Appendix C for a detailed description of how these lands would be managed if they are not classified as wilderness. Appendix C, however, shows that although no timber harvest is proposed in this decade, the future looks very different in succeeding decades. If these lands are not designated as wilderness, the fourth plan goes on to show that "proposed and probable practices" would involve the harvest of 2.5 million board feet of timber per year starting in 1991 - - this is four years away - - to the year 2000, 1.6 million board feet per year in the years 2001 to 2010, and 3.5 million board feet per year in the years 2011 to 2020. To what can we attribute the incredible discrepancy between a draft EIS, which says no timber harvest is planned and a forest plan which shows a proposed and probable harvest of some 76 million board feet of timber for the same area over the 30 years beginning in 1991. In an area which that same forest plan describes thusly, "Most of these lands lie above timberline, but isolated stands of Douglas Fir

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some Alpine Fir and Limber Pine do occur."

Whatever the reasons for this major discrepancy between the EIS and the forest plan, no explanation is given in the draft EIS, and the public has no way to evaluate what values will be lost if lands on the Targhee do not receive wilderness consideration and designation. Timber harvest of the magnitude described in the forest plan would in all likelihood destroy the Centennial's long-term ability to function as a bridge of carniferous habitat, linking Central Idaho to the core of the Greater Yellowstone Ecosystem.

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The Centennial Mountains Wilderness Study process has provided a glaring example of the inability of federal agencies to develop long-term land management strategies when multiple jursidictions and conflicting mandates are involved. The result of this fragmented management approach is ludicrous. Although the bulk of the acreage in the Centennials is all federal land, the wilderness study process has been gutted by the failure of the agencies to evaluate the sheep station lands. The omission of these lands which lie in the very center of the Centennials is inexcusable. The result of this omission if the formulation of a preferred alternative for a wilderness area that in places is less than a quarter mile wide and which follows a biologically

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meaningless boundary. That such an alternative could be seriously offered by professional resource managers in this day and age is a sad commentary on the world in a study process.

In summary, I request that the final EIS include the sheep station lands and study the values of the Centennial lands as a whole. Planners must abandon the fragmented approach which has been employed thus far.

The final EIS must provide the public with a clear understanding of how lands on the Targhee would be managed if they are not designated as wilderness. If the massive proposed and probable timber harvest which is detailed in the Targhee National Forest Land Use Plan is really no longer intended, a change from the direction contained in the forest plan should be clearly described.

The BLM, Forest Service, and sheep station planners must work together to arrive at long-term wilderness decisions for the Centennials. In addition to the short-term concern over hard targets and recreational uses, the long-term importance of the Centennials as a bridge between the Greater Yellowstone Ecosystem and the Central Idaho wild lands must be thoroughly addressed. The value of this area as an east-west bridge between adjacent wild lands may well be its overriding unique value in the next century. It is the responsibility of

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the land management agencies to recognize this long-term value and ensure that it is not diminished. Thank you.

HEARING OFFICER: Thank you, Miss Gale. Our next statement will be presented by David Skimore.

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DAVID SKIDMORE: I am David Skidmore, and I live at 5240 Redondo Circle. First of all, I want everybody to know I am for wilderness areas in certain areas. I think that's great. But I think we've had way too much, and I think it's about time that eastern sectors and Congressmen leave us alone and let us use our lands the way we want to use them.

I feel like that area up there for the snowmobiles - - I don't know how many of you are snowmobilers - - but it's great snowmobiling country. Snowmobiles don't hurt the environment for deers or elk or anything else, doesn't hurt at all, and I just think it should be left the way it is. Thanks.

HEARING OFFICER: Thank you, Mr. Skidmore.

Our next speaker is Bert Lilburn.

BERT LILBURN: May I postpone for a few minutes?

HEARING OFFICER: Yes, Mr. Lilburn would like to postpone his testimony for a few minutes.

Our next statement will be presented by Jerry Scheid.

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JERRY SCHEID: Thank you. I'm Jerry Scheid, and I reside at 1630 Brentwood here in Idaho Falls. I'm here this evening representing myself and the Idaho Environmental Council, and I happen to have a little different perspective than some of the folks here this evening. I have a ranch in the Centennial Valley, which is the valley on the Montana side of the line bounded by the Centennial Mountains. My family and myself have been in there since my father went in there before the First World War, so we've had a long, long acquaintance with that area.

I operate about 1100 yearling cattle on my ranch during the summer grazing season. I've had a chance to observe the valley ever since I was a little boy, and I can't begin to convey how I treasure that area. I honestly believe it's one of the most unique mountain areas that I've ever encountered in my travels over a lot of the West.

As far as use of the valley, my experience has been that the wilderness area proposed would not adversely impact grazing use. Grazing will still be allowed, and I honestly believe that the majority of the good grazing is in the lower valley rather than held by government agencies. I don't think there will be adverse impact there.

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As far as logging goes, I've watched them bring logs out of the mountains on the Montana side for many years, and although I can't represent myself as a logger or a timber expert, the quality of the timber they bring out appears to me to be definitely on the lower side, and quantities are not high in those mountains and not heavily and extensively timbered. It appears to me, also, observing year after year that the area is awfully slow to recover. We have hard winters up there. The mountainsides tend to be very light soil, and they're quite steep in a lot of areas, and they don't seem to recover themselves when they're timbered off very effectively.

The thing that I want to emphasize this evening that gives the Centennial Valley, in my eyes, is the tremendous amount of variety of wildlife. I've never been anywhere where I've seen the broad spectrum of wildlife that we have in the Centennials. I've heard it remarked that it's unusual to find deer, elk, moose and antelope all in the same - - almost the same area. We find that in the Centennials. The waterfall, of course, on the refuge in the upper end of the Centennial Valley have a tremendous value. The sandhill cranes have made a remarkable comeback there, and we see whooping cranes occasionally. We also see falcons on a fairly regular

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basis.

I believe that the Centennial represents an ecological value that we can't replace once we lose it. I don't think there's a substitute for it. I don't think it's another patch of timber area that may or may not deserve consideration. I think the Centennial Range is something that is very very special.

There's also an aspect I would like to emphasize. It seems to make good sense to me to add wilderness where we already have the core of the trumpeter swan up on the Red Rock Lanes. We are, in a sense, getting double value because we built on something that is already protected and has had a great deal of thought and preservation go into it.

O-16

I would like to recommend that the Bureau of Land Management, the other government agencies, adopt Alternative No. 2 and add the lands that are presently in the sheep experiment station to that alternative. Thank you.

HEARING OFFICER: Thank you, Mr. Scheid.

The next statement will be presented by Lee R. Martin.

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LEE R. MARTIN: I'm Lee R. Martin. I live south of here on Taylor Road. I have a cabin in the Shotgun area. Myself and my family use the area

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extensively.

Alternative No. 2 said there would be no snowmachine or that in the area. I can't see where the snowmachine has hurt anything. I'm tired of being closed out of areas for recreation. The wilderness area, myself and my wife cannot go to anymore, because she can't walk that far. We have paid taxes for 40 some years. We have earned the right to go there, and I don't think it should be closed. If you want to curtail the timber industry, that's fine. But as far as locking people out, I don't think it's right. We've earned the right to go in there so long as we don't abuse it, and by locking us out, I don't see where it's justified. It's like closing the park and saying, "Well, we won't back up the laws we have, no drinking, we're going to close it, no drinking at all."

I still think we should be able to go in there. Just let them enforce the laws we have to keep people from tearing the area up. Thank you.

HEARING OFFICER: Thank you, Mr. Martin.

Our next speaker is Stan Glenn.

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STAN GLENN: My name is Stan Glenn, and I am Resource Manager for Louisianna Sawmill Corporation in Rexburg, Idaho.

This mill directly employs 57 people, plus

31B we contract our logging, lumher hauling, and purchase operating supplies locally. Overall, the Rexburg mill provides employment for well over 100 people. I think there's some people that come in here and they really think they're doing a lot of good. They're thinking they're going to preserve something that's up there for everyone.

The problem is, we already have an over-mature decadent stand up there. No management is never the best management.

The timber areas of the Centennial Mountain study area are 80 percent mature and over-mature Douglas Fir. Experience has taught us if these forests are neglected and allowed to continue to deteriorate, we'll see them weakened by insects and diseases such as the Spruce Bug Worm, which is already present in epidemic proportions, causing mortality to the under stories and severely weakening the over stories to the point they can no longer produce seed.

If you've been up in this area and you've looked around, you will very seldom find anything under 30 years old, any kind of Douglas Fir at all. The reason for that is we maintain a multi-story span. This means that there's over-mature Douglas Fir, which is the host to the Spruce Bug Worm. The Bug Worm starts up on

31C top of the canopies of these trees. It comes down on a web-like thread. They drop down into the under story and kill it.

Entomologists have been telling us the Spruce Bug runs on a three-year cycle. This has been going on for about 15 years now. We have allowed managed forests even to reach a point where they can no longer recover until we start managing our grounds correctly.

By weakening the older stories to a point where they can no longer produce seed, and Mistletoe which has already severely infected a major portion of the Centennial Mountains Forest, causing trees to be mishapen, to grow very slowly and be susceptible to attack by other diseases and insects, if we allow these over-mature stands to continue to degenerate even further, we will certainly see our Douglas Fir forests wiped out by catastrophic insect and disease infestations as the Mountain Pine Beetle epidemic which killed the lodgepole pine forest in and around Yellowstone National Park in the '60's and through the '70's. The area being studied is currently experiencing a negative growth, which means the forest is dying faster than it is growing. These lands and others that have been tied up and not managed to their full potential for over 15

31D years. Action is needed now to release these lands to allow multiple use management.

The designation of wilderness in the Centennials would disallow any kind of management practices on the wilderness itself and severely restrict and increase the cost of managing the lands in the surrounding area. I'm sure we're all aware of the costs that are involved in managing an area like the Targhee Forest. The timber is not the highest quality timber in the world, but the land as land use managers still needs to be managed and to impose additional costs into the managing practices is foolhardy. The community is dependent on renewable resources that the land can provide us. A wilderness designation is a mandate telling us we can no longer work and live here. Also, the Centennial Mountains area does not really meet the criteria of a true wilderness. It is several worlds penetrating its interior. It is heavily used by winter recreation, snowmobilers, and does not have contiguous or matching boundaries.

Also, due to a comment before, I've been in forestry almost all my working life, and I try and enjoy wildlife as much as anybody. But I also recognize that a healthy dying forest cannot support wildlife. Some of your best elk hunting in the world is in the

31E Tillamook Burn , which is really nothing other than a huge clearcut. A clearcut philosophy doesn't work here, and I'm not going to say it does, but you need to have an under story. You need to have something up and something growing in order to maintain wildlife, and Douglas Fir just can't do it, not without some management. And if we don't provide the management tool, insect, disease or fire, something else is going to do it for us. And that would be a horrible waste of resources. Thank you.

HEARING OFFICER: Thank you, Mr. Glenn.

Our next speaker is Marty Huebner.

32A MARTY HUEBNER: Thank you. I'm speaking tonight as an individual. Our sportsmens organization will have a report for you by the end of the report period.

But I agree with the gentleman that just spoke that resources are something that you've got to keep careful with, because if you squander your resources, it's like eating your seed corn. But I'm looking at the resources in the Centennial from a broader perspective, and let me tell you what that background is.

I'm like Mr. Scheid, I've had the privilege to live there part of the year all my life, but I've spent a great deal of time there in recreation.

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In 1980 I was appointed by the Secretary of Agriculture to be an advisory member on a group called the Continental Divide National Scenic Trail Committee. This is an advisory committee set up by Congress to scrutinize the desirability and feasibility of running a trail from - - along the Continental Divide from New Mexico to Canada. That sounds like a grandiose project. It is over like 3100 miles, as I recall, total length. But people have hiked the whole length of the Continental Divide Trail and suggested to Congress that might be something to incorporate a national trail system.

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So from 1980 on, since the only part of the trail that I was one of two people from Idaho on the committee, myself and the man from the State Parks & Recreation Department. There are only about 80 miles of the Continental Divide that goes between Idaho and Montana. That was the only part of the trail I really was real familiar with over a six-year period, plus whatever else I could pick up on my own when I visited other parts of the Divide in other states. So I spent about three summers thoroughly researching the Continental Divide in Idaho and Montana, and I spent a lot of time in the Centennial Area. And I guess I'm a bit appalled to find out what I consider the skimpy amount of country

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O-16 cont.

recommended by the BLM and the Forest Service for incorporation of wilderness. Sure, there's roads in there and sure, there's trails in there and you've got a sheep station, but basically, what I recall of the sheep station country is its rangeland. It's fenced and so forth, and so what, as far as wilderness is concerned, wilderness area is not good grazing under circumstance, and grazing's going on there right now. If it was incorporated, it wouldn't affect anything I know of.

Just so I won't keep you on the edge of your chairs, I'm recommending Wilderness 2, and let me tell you some of the reasons I'm for it, Wilderness Alternative 2. I'm just quoting from the Impact Statement here. One thing I like about it is that on this all, only 16 miles of vehicle roadway would be closed to vehicle use. Six cherry stemmed roads, that means leaving the roads to corridor into the wilderness would be maintained, that for hunting, fishing purposes, and I like that aspect. Access to the sheep management station would be maintained. The entire southern area would be closed to snowmobilers. I have never been in the high country in the winter time there, so I can't vouch for that impact, wildlife there or not, but I guess I'm conscious of the fact I do go in Yellowstone Park a lot, and in the wintertime and recreate there, and I've

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seen all different kinds of effects on wildlife, both by cross-country skiers who are alleged to not have any effect on wildlife but do, and snowmobilers, which also have effect on wildlife.

So I guess my inclination would be if the resource, in this case wildlife, is liable to be affected in any way by any kind of vehicle use or any kind of recreation use, whether cross-country skiing or snowmobiling or whatever, I would support this recommendation that recreation of any kind that affects the wildlife value should not be allowed.

It goes on and there's quite a long section here about wildlife habitat and how it benefits habitat for the grizzly bear, wildlife habitats, deer and elk, which I saw there on numerous occasions. One statement kind of tickles me. It says introduction of mountain goats is recommended on public lands in the Centennials. However, this would not impact the wilderness section, because goats may not be native to the area, and motorized vehicles will be needed to bring in the goats.

I guess I would like to ask from my extensive hunting experience for bighorn sheep and goats, I would say some of that country is perfect for sheep and goats, the statement makes it a little bit ludicrous because nothing could prevent stocking that country with

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sheep or goats or anything you want before you make a wilderness area. You'd have to bring them in with motorized vehicles, so I find that a rather facitious comment.

To go on, livestock grazing wouldn't be affected, and that's good. The fire management policy that now exists in national parks and other wilderness area which says if God causes a fire here, let it burn but if man causes a fire, you put it out, I think is a good one. The fact you've got trees overmature and may not be good for anything other than bugs to eat doesn't bother me. I know there are - - I'm very sympathetic, a lot of people have to make their livelihood or have made their livelihood in the timber business. However, it bothers me as a taxpayer to know that I don't think there was a single timber sale in Idaho in the last ten years that I know of that ever made a profit, due to the treasury. It's all been a loss, and the less timber going back to that idea about the taxpayer. I don't know about the mineralization. I've seen some prospecting up there, as I recall, but it can't be too attractive a mining prospector or we'd have mines there.

The last statement saying that current soil stability and water quality remain unchanged on the 35,000

32F unstable soil, and they would not be able to do any soil stabilization processes because you wouldn't be able to use motorized equipment. I guess I submit if we catch them messing around up there with vehicles, with logging equipment and the like, there might not be any stabilization.

Now a couple other points: The lady, the biologist mentioned that the plan seemed to be a little inconsistent. **K-1** They talked about you don't need to consider a wilderness on the Idaho side, because Targhee doesn't plan to do any timbering there, but in the long-term forest plan they are going to timber there. I don't know why that wasn't elicited during the study.

The sheep station to me should be included in the wilderness area without any difficulty whatsoever. The buildings are down in Dubois. There's not much up there as I recall up there in the Centennials but a bunch of fences and gates, and that doesn't hurt anything.

The west end of the territory where, I believe, this gentleman indicated there's a lot of timber that needs to be harvested is a part of the terrain that's probably the most unstable, so on one hand we might go in and extract a timber resource, probably at the disadvantage of the wildlife resource and the ground

32G resource. I just don't see that.

So in summary, I am personally, based on my experience and study on another issue, that is researching the country for its suitability for a trail along the Divide - - and I was looking at things like where springs were and where there's timber and where there's wildlife and all this kind of stuff, but I got a real good look at that country from the ridgeline down, and I also found out it's not always fun to camp in those crags in the summertime with thunderstorms rolling in. You find out you shag down the mountain pretty quick and find out where the cows are and stay with them the rest of the evening, which works out pretty well.

But anyway, my personal feeling based on my exposure to that area and study there on another issue, make me strongly feel that the areas, the deferred alternative for this land should be Alternative 2 and include the sheep station in that. Thank you.

HEARING OFFICER: Thank you, Mr. Huebner.

I also want to remind you folks as you come up, restate your name and whom you represent.

Our next presenter is Tom Worden.

33A TOM WORDEN: I'm Tom Worden, representing the Idaho Forest Industries in St. Anthony. We employ about 100 people at the mill and probably another 200 **33B** indirectly in the woods. The mill is probably one of the few things that really does support St. Anthony right now.

I guess what I want to touch on is the real values of the area as far as wildlife. We can all, I guess, normally we do debate is an area - - should an area be logged, shouldn't it be logged, what is good management. But it looks to me like after sitting down and studying the proposal, the Alternative 1 that after we drew a line around all the numerous roads and mines and the sheep center, watershed contouring, the development for the springs, state land, a ski area, all there really was left was a fragmented piece of ground that still has a mile road in it and other little segments of road. And the uniquely camouflaged SCS snow force. I think if you sat down and evaluated and really studied the map, you would see that what you're really looking at in the area they are proposing as wilderness, and the only part that does justify any consideration, is a piece of ground that's about 30 miles long and averages about two miles wide or two miles deep, and as Ruth Gale mentioned, there's portions of it that are only a quarter mile wide at all. In fact, I'd like to see somebody take their wilderness experience in the area and ask you to be able to go up there without a compass

33C or map and walk that wilderness piece of ground and stay in it and not come across one of these developed areas.

As far as being a wilderness experience, too, if you were in there you've got Red Rock Road, which is about a mile north of the whole contiguous piece of proposed wilderness, and obviously if you're a mile away you're not going to get away from the traffic, and you'll still be able to see the dust flying.

The furthest you can really get into the area and get away from everything is about two miles without running into a mine or an area that's been logged already or something to this effect.

There was a statement made in the EIS that the studied area provides primitive and unconfined recreation. It's hard for me to understand how an area can be primitive and unconfined with a fragmented piece of ground that's been developed for years and years.

So I guess because of the minimal size and the other two considerations that I'll touch on is for an area to have wilderness value, it's supposed to provide solitude and naturalness. And how do you go and experience a hiking trip or whatever it is you're going to do and really find solitude and naturalness in an area that has been so developed.

I guess Idaho Forest Industries isn't

33D completely against wilderness, but let's look at areas that really justify wilderness. Is this an area that is or isn't? Idaho Forest Industries really believes it isn't. It doesn't even come close.

The other important factor, too, is the economic portion of it. If the Targhee, the Beaverhead, the Gallatin Forests, are all decreasing their log cuts. Everybody is probably pretty much aware of that. The EIS does make the point that from an economical standpoint, any wilderness versus no wilderness is going to lose roughly $400,000 to the economy. I don't believe, itself, East Idaho, Southwest Montana can tolerate that. Thank you.

HEARING OFFICER: Thank you, Mr. Worden.

Our next speaker is Jerry Jayne.

34A JERRY JAYNE: Thank you. My name is Jerry Jayne. I live in Idaho Falls, and I'm speaking for myself. The proposal by the Forest Service and the BLM is inadequate to protect the important wildlife and other wilderness values of the Centennials, recommending wilderness designation for only about 26,000 acres of a wild area of roughly 90,000 acres. It's important to realize that this area is already wilderness. It has the characteristics of wilderness now. It's simply unprotected wilderness which is threatened.

34B A-5 About 42,000 acres of this 90,000 acre chunk is in Idaho, south of the Continental Divide and the Targhee National Forest. Yet the Forest Service is recommending no wilderness. No good reason is given for this negative recommendation in the draft EIS. Appendix H says that the four roads going north to the Divide, the sheep station traffic, the valid phosphate claims, and the watershed contour flowing affect long-term manageability and reduce the quality of the wilderness experience. But the fact is the Idaho side of the study area does have wilderness characteristics as defined by the Wilderness Act of 1964 and as determined by the study itself. Since very few of our country's remaining wildlife areas are truly pristine, it is not logical to make a negative wilderness recommendation based on this degree of impairment, which is not as serious as the previous speaker indicated.

Appendix H also says that the southern boundary of the study area falls at mid-slope, and is very difficult to locate on the ground. This, too, is not an adequate reason to recommend against wilderness designation. What such a statement may indicate is that the study boundary should be further down the slope. Maybe the study area does not include all the contiguous undeveloped national forest land to the south.

34C While it's true that the Targhee Forest has no planned timber sale for this forest planning cycle, it is true that the forest plan allowed for timber harvest there in the event of what the Forest Service calls a "catastrophic occurrence" such as an insect epidemic, blow down, or fire. A fire might or might not be allowed to burn. Thus it does not appear that the Forest Service would manage the area in the Targhee part of the study area as wilderness unless required to do so with a wilderness designation.

It's important, also, to realize that a wilderness area should not be managed. It should be left alone and protected from the people who would destroy it. Wilderness must be free to evolve, for the forces of nature to take place and do its thing, just as it's been shaping life on earth for the last two billion years.

Furthermore, without a wilderness designation, the Forest Service could even plan saw timber sales later, in the next forest plan cycle. A large fraction of the Douglas Fir saw timber offered by the Targhee Forest comes from the Sheridan management area, which includes the lower slopes of the Centennials adjacent to the wilderness study area and on the south of that. Some portions of this management area have

34D already been cut quite heavily. What is alarming is the fact that the forest plan calls for a drastic increase, forest-wide, in the Douglas Fir cut, from an annual cut of seven million board feet a year now to over 30 million board feet a year in the next decade. Of course, much of this timber would come from the Centennial Mountains, the lower slopes, and perhaps even the upper slopes in the study area, because they are unprotected wilderness. Of course, much of the Douglas Fir on the Targhee in the Centennials is old growth, which is biologically very diverse. It provides for diversity, great diversity and is far more valuable as such than any value it has for saw timber.

O-16 Alternative 2 doesn't include sheep station, the sheep experiment station should be included. The fact that it stands for agricultural research service should not prohibit it from being considered for and recommended for wilderness. It only says the BLM does not have to consider it for wilderness, but we think they should and that the ARS should become more cooperative and realize it's to our benefit to recommend it for wilderness.

The draft doesn't indicate why the agencies selected Alternative 1. In fact, many of the findings in there seem to indicate more wilderness is in order.

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The draft says on Page 56 of the all wilderness alternatives: "Wilderness designation would have significant, positive impacts upon habitats for elk, fisheries, wolverine, grizzly bear, Canada linx, accipiters, including sharp-shinned hawk, Cooper's hawk, goshawk and spruce grouse. It would also have positive impacts on fishery, waterfall, and bald eagle habitats in the Centennial Valley."

On the other hand, the draft points out in a section on Unavoidable Adverse Impacts, "If any alternative proposed in this study other than the all wilderness alternative is selected by Congress, the remaining acreage may be subject to timber harvest; livestock, wildlife and watershed improvement projects; energy and mineral development; and motorized vehicle use. All these activities would adversely affect to some degree the study area's naturalness, visual values and solitude." In fact, this may be a little bit of an understatement, since the draft gives little description of the predicted impacts upon wildlife caused by the developments which nonwilderness would allow.

F-3

Nor does the draft discuss the study area as a part of the Greater Yellowstone Ecosystem and how it is important to the survival of the species found in the Yellowstone Ecosystem.

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I urge the BLM and Forest Service to recommend the all wilderness alternative, and to add all parts of the sheep experiment station which qualifies. I think it's important that our land management agencies realize they can no longer manage our public lands for the sole purpose of satisfying various human greeds. It's human greed that is destroying the natural values of the world. The Centennials are just one little piece of this, it's a natural area with outstanding wildlife values, wilderness values that should be protected, and, therefore, I urge the agencies to select the all wilderness alternative. Thank you.

HEARING OFFICER: Thank you, Mr. Jaynes.

Our next speaker is Clark Collins.

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CLARK COLLINS: My name is Clark Collins, and I represent the Blue Ribbon Coalition, which is an organization of motorized recreationist and, in fact, involves several resource industry organizations, as well. We'd like to go on record in support of Alternative 3, the no wilderness alternative.

I kind of liken the arguments of the wilderness advocates to someone coming, having a picnic on your lawn, and your lawn is well kept, and there's flowers growing around the border, and it's well mowed. And you come out to mow the lawn, and these people say,

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"You can't do that. You're going to destroy this lawn."

There is joy in your beautifully prepared lawn, and they won't let you mow it. What would happen if you quit mowing the lawn and quit planting the flowers and weeding them around the borders is that the lawn would turn into weeds, the flowers would be overcome with weeds, all you would have is a big patch of weeds instead of this beautiful well kept lawn.

Well, that's kind of what they're trying to do to these wilderness areas they're trying to preserve. They're trying to turn it into tangles of downfall. They're trying to turn the trails into something you cannot use. They're trying to eliminate all uses but their own, and that does not represent sound multiple use management. The best way to protect the resource is through the disbursement of use, not the concentration of use of it as mandated by wilderness designation. The only way the wilderness advocates' ideology will work in protecting our natural resources is if they succeed in locking up it all.

The only thing they're succeeding in doing is concentrating their types of use, wilderness recreation, which does not preserve the resource. In fact, on the Challis National Forest, an area where in the past you've been able to drink the water, now the Forest

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Service has directed their personnel you can no longer drink the water there, because it is infected with giardia, that is the result of recreational use of that area without proper sanitary facilities, which is a real problem in wilderness areas throughout the country.

Timber and mining have taken place in the Centennials and have not destroyed it yet. Now why are we to believe that if timber and mining are allowed to continue in that area, it is going to be suddenly removed from the face of the earth? The fallacy in wilderness recreation and in the wilderness proponents presenting it as a recreation management designation.

E-3

Recreation is not enhanced by wilderness designation. There are far more recreationists using the area now that would be eliminated by the wilderness designation. I'm speaking of motorized recreationists, snowmobilers, trail bikers, four-wheelers. They haven't destroyed the area yet, and I don't know why we are to believe that they are going to destroy that area if not eliminate it.

In a lot of wilderness areas, trails are lost and recreation opportunities eliminated rather than improved by wilderness designation. Several of the motorized recreation groups participate willingly in volunteer trail maintenance that improves the trail system for all users to enjoy. That type of trail

35D

maintenance is eliminated in wilderness areas, and in many wilderness areas has had a detrimental impact on the trail systems there.

We feel that the resource industries and the recreationists can share the same resources. The timber industry should be allowed to cut the timber when it is mature, the miners need to extract the resources that are valuable to that industry. Trying to turn the Centennials into another wilderness would be like creating a Disneyland wilderness, and I would like to suggest that if the wilderness advocates want to create a Disneyland wilderness where it doesn't exist, they should buy private property and then they should create whatever they like.

Statements have been made that wilderness doesn't affect grazing. That's a fallacy, because in wilderness areas, no improvements are allowed to upgrade the grazing facilities there. They're not allowed to build water troughs for the game, which by the way, watering troughs - - I mean for the livestock. Watering troughs built for the livestock are utilized very heavily by wildlife, and those types of improvements are not allowed in wilderness.

E-1

With regard to motorized recreation and its impact on wildlife, there's been a lot of areas closed

35E

E-1 cont.

to motorized recreation to protect grizzly bear habitats. Now when was the last time you heard of the grizzly bear being destroyed because of an encounter with a trail bike rider or snowmobiler? We've had several grizzly bears had to be destroyed because they have acquired tastes for hikers, and this always results in the grizzly bear being destroyed. If you want to protect grizzly bear habitat, I suggest that the hikers be disallowed in the area and trail bikers, who the bears can hear and get off the trail and avoid, be allowed to continue to use the area.

In closing, I'd like to say that, again, the Blue Ribbon Coalition and the groups we represent support Alternative 3 and feel that any future management decision to protect the areas for wildlife habitat should exclude non-motorized recreationists first, because they have more of an impact on the wildlife than the motorized. Thank you.

HEARING OFFICER: Thank you, Mr. Collins.

Our next speaker is Hal Augustin.

36A

HAL AUGUSTIN: I am Hal Augustin from Island Park, Pond's Lodge. The Centennials are kind of in the heart of the people in Island Park, because most of them live right next to them, and most of them spend a lot of time in there.

36B

We're an outfitter and guiding outfit in Island Park, and we do winter outfitting. Now one of the highlights of any group that comes from Pennsylvania, New York, Chicago, wherever, is to go into the Centennials, stay overnight at Lakeview and come on back. That beats going into the Park. You don't meet hardly any people. You have great mountain riding, and everybody enjoys it.

M-29

The business community in Island Park in the wintertime depends on winter recreation. If we shut the Centennials off to motorized, which is the snowmobile, you put quite a few people out of business, myself and a lot of other ones.

What we would like to see, if there is any wilderness to be put up, we would like to see, the Chamber of Commerce in Island Park and myself, is Alternative No. 1, with the request to have Odell Creek, which is the only access into Montana, be on a grandfather clause or something where snowmobilers could pass through. If you've ever been in the wintertime in the Centennials, except for last winter, you're on six to eight foot of snow. I have never seen any wildlife up there other than an eagle. I cannot say what's in the summertime. I don't think you would hurt anything to go on Odell Creek to get into Lakeview. The nice part last winter, as bad as the snow was, we took a

36C

couple handicapped folks over there, some people that only had one leg and stuff like that. I'd like to see anybody have them people hike in the wilderness. If you have the motorized, you can take them along. They enjoyed it. That was one of the real highlights of their being out here in the West.

So, again, we would like to see, if we have to have one, we would like to have No. 1 with the exception to have Odell Creek open to be able to get through the Centennials on the Montana section. Thank you.

HEARING OFFICER: Thank you, Mr. Augustin.

Our next statement will be presented by David J. Fowler.

37A

DAVID J. FOWLER: Gosh darn, all I've been doing is just taking a few notes. I didn't know what in the heck was going on here tonight until just a little bit later. I want to tell you people one thing. I've been in the recreation industry for a long time, and you take the recreation away from the people, you take it away from them, and what have you got? Sure, all you guys with good backs, good legs, good everything else, you can go up there and hike around and everything like that. How about the poor son of a gun that's been around there for 75 years paying your taxes, everybody

37B else's taxes and paying everything else all the way through? Well, hey, I don't think you should take this away from these people. It isn't hurting a doggone thing. You're talking about grizzly bears in the wintertime. Where are they hiking? They're hiking back down in the ground. They're already asleep. Show me one grizzly bear I've run into in all the years I've been snowmobiling, all the years I've been doing all this recreation bit in the wintertime. Show me one.

I really think it's a decision that everybody has got to make. I think that there is a few people trying to take over everything that the most majority - - okay, we're going right back to the silent majority. For crying out loud, you've got enough money to fly into a place. I've seen that happen on the Salmon River. I've seen them fly in there and stuff like that, and nobody else can even do anything except hike back there.

I think motorized vehicles, as long as they're on the road, as long as they're controlled, I think - - and not just the road, maybe a trail. I think they are - - hey, they put up less mess than a horse does. Have you ever seen one of those doggone four-wheelers poop out something like that? I've never seen that. For crying out loud.

37C Talking about logging, you're talking about this. Hey, what's your house built out of? Isn't your house built out of cotton pickin' timber? It's built out of brick? Well now we've got to mine a little bit of brick. Pretty soon, the way you guys are acting and stuff like that, what you're going to do is live back in the dark ages where nobody can do anything except with a club and a stone and all that kind of crap. Hey, that's what you guys are looking for.

For crying out loud. We have got motors that can move up there, and they can do it economically. They don't put up a whole lot of pollution. They don't do all this other stuff.

For crying out loud, I could take an egg. I could take an egg right now, and I could take any one of your snowmobiles over that son of a gun, put it in the snow, run over it, and I can run over it 40 times in one day, and I can't even break an egg. What am I hurting? What is anybody else hurting? Not unless they get into real shallow snow, and that's where education comes into it.

I don't think cutting off - - I think education on the son of a gun. Let's take a little bit of education. You guys put your - - I see all this mess up here. I've been writing down all your notes,

37D and this kind of stuff. You're talking about a forest of stuff like that. For hell's sake, it's got to be logged out. You can't just leave the son of a gun there. For crying out loud, you wouldn't leave tomatoes in your garden all year, or else it's got nothing. Yeah, I think that's really kind of crazy, and stuff like that. I really think that it should be open to snowmobiling. I think it should be opened up to even four-wheelers, three-wheelers, two-wheelers. Hey, boats, motors, anything of this nature like this.

For crying out loud. But - - hey, let's keep it down on it. I can remember when I used to go up on the river here and there was beer cans all over here and beer cans all over there, and pop cans. Believe it or not, a whole bunch of pop cans, Pepsis. There's a guy up there and he likes to fish, and he drank Pepsi Lite. Boy, he just threw them right down. Boy, he was just having himself a good time. Hey, that pop can is as bad as a beer can. I don't understand all of this stuff. You guys trying to close down something for somebody that can be - - maybe it has to be motorized. I've got an 80-year old father-in-law who can't fly fish in Island Park anymore. That's stupid. For hell's sake, he paid more taxes than you and I both did.

I don't know, this is - - you know, this

37E kind of makes me a little angry. I finally found out about this meeting, like I do most of these meetings, about two hours too late. But really, I want every one of you to sit and think about it and maybe something you want to do. Hey, maybe you'd like to go out here and sit down in the park. Maybe we ought to close the park down, too. I really think that you're trying to close the park down to people on motorized vehicles, people that are trying to make a living in logging, or whether it is anything else. How would you like it - - I mean, I don't know where you work, but all of a sudden they came to you tomorrow and said, "Guess what, you ain't got a job, because everybody else thinks you're not capable of doing this son of a gun, because we don't need you anymore, because everybody else wants to come over and walk through and check your desk out."

Not that they're going to bring a snowmachine or something and go right through your desk. I'm asking every one of you to look at one thing. Look in your hearts, and think about everybody, not just you, everybody. Somebody that - - hey, has got a pain, and he wants to fish with a cotton pickin' fishing pole, and he's got a worm, and he can't fly fish anymore, or somebody that can't hike back up in the mountains, and, you know, be able to walk up there and snowshoe up there

37F or ski up there or anything else. Look at somebody else. Just look at them, and then you ask yourself a question the way that you want to go on this. Thank you, very much.

HEARING OFFICER: Thank you, Mr. Fowler.

Our next speaker is Jerald Baument.

38A JERALD BAUMENT: I'm Jerald Baument, and I'm in the recreation business. I'm also a cabin owner in the Island Park area. I've been hunting and fishing up there for 35 years, and the last four years have driven over 3500 miles in the Centennials, myself personally. I have never seen a bear in there; I ride clear into the spring until it's gone. I've seen a few moose in there, but in the winter there's nothing anybody is hurting in that Centennial Valley, especially on the Idaho side. I don't care much about Montana, it's all sagebrush and rocks anyway.

But I'm going on record that I support to keep it all open. As far as the trumpeter swan, all them are down by the road anyway. That's where you'll see them. There's not many of them back up in the mountains.

I think that they take and make a wilderness area out of this it's going to make all the property values go down up there, because it's just something

38B there aren't enough people who can afford to buy them without motorized recreation.

I'll go on the record that I support motorized recreation. Thank you.

HEARING OFFICER: Thank you, Mr. Baument.

At this time I would like to call on Mr. Bert Lilburn.

39A BERT LILBURN: Good evening. My name is Bert Lilburn. I'm a Director with the Idaho Public Land Users Association. In your draft management plan on the wilderness area, we would like to see you include some of the recent experiences with the Targhee, and we're talking specifically on the west slope of the Targhee, I believe wilderness, I believe it was last year. An example is we're now talking to horsemen and prior to that year, they were a little irritated once in awhile because of that noise the cyclists would make, but they found that we came in there and cleared the trails and kept those open. As a matter of fact, I'd like to also point out that the Idaho Trail Machines Association does more volunteer work on any of the national forests or any of the forest lands in Idaho than all other groups combined.

We're also finding because these trails are not being cleared, horsemen now have to go back and forth

39B across the trail and they're getting off the trail, and it's disrupting that whole area. They're getting more destruction to the trail system.

In addition, we would also like to point out that you're going to have increased costs in the wilderness area due to calling it a wilderness area, because we can no longer go in with a chainsaw and clear the areas out. You have to use a bandsaw. They really don't clear the trails very well, and people are going off the trail.

We'd also like to have you include the increased costs that is going to occur because of this, and I'm talking specifically in the monitoring of our higher mountain lakes for acid rain. That's usually the responsibility of the EPA, and right now they cannot fly into the wilderness area to monitor for acid rain, and it takes them probably ten times the additional cost to pack a horse in with the equipment. There's about a 24-hour time lag. We'd like to have that in there, also.

We'd also like to have included and like to see in there the Montana Study. If you're not familiar with the Montana Study on elk, they went in and some people in the studies were more or less an observation of elk and the effects of human beings, motorcycles, snowmobiles, planes, people on horseback.

39C What they did in this study, they went in and put heart monitors on elk. And they could read out what the elk's heart was doing. And then they went in there and took a look at the effects of human beings walking, snowmobiles, ORV's, trail machines, cars, gunshots. And the highest - - what they found was the most disruptive to the elk were two causes, people on foot, because it startled the elk, and gunshots. ORV use, snowmobile, planes, cars had no effect - - very little effect. We'd like to see that study included.

M-30 We would also like to have included in there the loss of money that the schools will have due to this wilderness area. I'm coming specifically from that in Idaho there are $10 million going through the counties each year to go to the schools and county governments. This money comes from grazing rights, leases, mineral rights, that type of thing that would be lost. I would recommend that you also contact your County Commissioners in this area, because all the County Commissioners of the State of Idaho come up with a resolution recommending no more additional wilderness area because of the impact this would have on their counties.

We'd also like to point out and have a document changed to indicate the loss of the recreation for the handicapped. Because there really - - about the

39D

only way you can get them in there is on some kind of motorized recreation. An example would be you probably are aware of this anyhow, but you cannot take a bicycle or mountain bike. We see a lot of increase in recreation and mountain bikes, that's illegal in the wilderness area. You cannot take a mountain bike or your bicycle in the wilderness area.

We would recommend not building additional roads in this area. We're very much concerned to keep the area the way it looks right now and continue to protect it. We're very much for protecting that and protecting the wildlife there.

We also would like to have you include in there some recent information from the Sawtooth Wilderness area. An example is that the wilderness use in the Sawtooth has dropped 30 percent since 1979. It's gone down. A source of information is the Sawtooth Management Plan. We'd like to see that referenced.

Currently the wilderness use in the Sawtooth National Recreation Area is two percent. In other words, of 100 people that go there, two people go to the wilderness area.

J-7

The other thing I think was already mentioned earlier is that we'd like to see included in there the effects that will be caused to the mountain lakes on the

39E

J-7 cont.

drinking, and we're using the Challis Forest already issuing warnings not to drink the water because of inadequate facilities there.

L-6

We'd also like to see included in here the effects that this would have on the noxious weed program. The noxious weed program you go in and spray where those would be affected. We recommend you contact your county officials who are responsible for that and include that as the effect it's going to have on it.

O-18

We would also like to see a better definition, make it very clear to the people reviewing this what a wilderness area really means. I'll give you an example, where you're standing right now. This area here. If this was federal land and if the roads were not mechanically maintained for one year, you could qualify it as a wilderness area. We would like to see that definition clarified and included in there so people know that areas that really had roads, looks like a road, smells like a road, would be included as a very clear definition in there.

We'd like to go on record as recommending Alternative 3. We'd like to do this in the name of Laurie Houston. You probably don't know Laurie Houston. She's now dead. She was a teenager in Salmon, and she died from sniffing White-Out. She left a child; she was

39F

unmarried. Our main concern is that children - - and I'm sure your children have a very hard time growing up - - it isn't like when I grew up. You know, I went to high school in 1963. Things were a lot different then. We didn't have drugs in our high school. We didn't have MTV with all the sex coming out of it and everything else. We didn't have to face those problems. It's not going to go away tomorrow, no matter how hard we try. It isn't going to go away. It's going to be there; our children have to face it. What we'd like to see is more opportunities - - alternatives to White-Out. I don't know if you're familiar what they do with White-out. You take the bottle, put it in a bag and sniff it and get a high off it. What I'd like to do is have us provide an alternative to the children that's coming up to White-Out. Let's give them some alternatives to free teenage sex. Let's give them alternatives to, you know, all-night parties or whatever goes on. Let's provide them an alternative so they can go and get in a four-wheel drive and take them up to a place and have them go with the families.

So we recommend, and we'd like to see Alternative 3 as the one chosen.

HEARING OFFICER: Thank you, Mr. Lilburn.

I have several cards where the hearing

39G

participants were not certain about testifying. I will call their names out now and offer the individuals the opportunity to make a statement or final decision. Steve Janes?

40A

STEVE JANES: My name is Steve Janes, and I am with Snowmobile West magazine, and we're located here in Idaho Falls. So I can say I'm representing myself and 125,000 snowmobilers in the Western States.

This is such an emotional issue, it really takes - - it's hard to sort out. We've tried to get the feelings from readers in various publications that we do to see what they think about wilderness, and in the most recent survey we're conducting, I was tallying up some results. And 85 percent of the people out there surveyed indicated they think there is either enough or too much wilderness right now. And also, that same 85 percent would like to see something come about quickly to release those lands that are locked up in the wilderness study.

On Centennials, I have had an opportunity to ride there on a snowmobile, and I've had an opportunity to take pictures. I've enjoyed the scenic beauty there, and I've been able to use those pictures to let my readers enjoy what's available. And I would certainly hate to see that locked up and lost for us and for others, because

40B for those who've been in the Centennials, you know how beautiful it is in the winter. And it's something we would not like to see happen.

If we're concerned about wildlife in that area, then I'd certainly recommend no wilderness, because I believe that our land managers are capable of maintaining the wildlife level, the quality there. And if we tie their hands with wilderness legislation, they can't step in and help out in case they need to manage a big game herd. It's lost to them. They can't manage the wildlife, so wilderness would not help us that way at all.

I don't think that if we put the big W on that area, you know, capitalize wilderness in the Centennials, I think if we do away with that big W, I can't see that land changing overnight. I can't see it losing its wildlife characteristics, whether or not there's wilderness label on it. The Centennials are going to remain the Centennials. All the big W would do is lock it up for recreational use, lock it up for those of us who really find enjoyment in that area.

I'd like to go on record supporting Alternative 3. I think it's the most viable alternative that is suggested. The land is there for the public use. I have a lot of confidence in our land managers that they

40C are capable. We're paying them good money to manage that land, and I believe they're capable of managing it without us tying their hands by locking it up in wilderness legislation.

HEARING OFFICER: Thank you, Mr. Janes.

Tara Rhatchatourian, do you wish to make a statement?

41A TARA RHATCHATOURIAN: My name is Tara Rhatchatourian. I live in Island Park, Idaho, and I am representing the Sportsmans Club in Island Park, Idaho, and the Island Park Forest Roundtable community.

The first thing that I was thinking of is wilderness is, to me, a closed door. And like Steve Janes says, it ties the hands of people that we're to respect and feel can manage the land properly. I thought that was a very nice way to put it, and by doing that, also, by declaring the area wilderness, we're shutting out handicapped people for one. We're shutting out people from Pennsylvania, people from all over. Also,

M-31 by doing this, we're hurting the businesses. Loggers say, okay, their business is hurt. I'm in agreement, but also the businesses that make money off the snowmachiners and the tourists, like Hal Augustin says, he has a business there. And it thrives on snowmachining in the wintertime. Mack's Inn, the owners there would suffer quite

41B a loss of business in the wintertime, also.

Therefore, I am for Alternative 3 very much, because I feel that it's important for everyone, all the people to be able to see a trumpeter swan or a moose or anything. I don't think anything should be closed off to us, as long as we're not abusive to it.

One thing I wrote down, the one man from the sawmill was talking. I believe his name was Stan Glenn. He talked about an over-mature forest. Okay, and how important it was to cut the tree, and this kind of thing, and he was referring to a Douglas Fir. No one has quite said, a Douglas Fir, for its total maturation takes 120 years, and 120 years, even if I were to have children now and those children had children, would not see a mature Douglas Fir.

And I don't believe that this is emphasized enough in logging in any area, whether it be the Centennials or Island Park itself or any area. Trees are just as important as wildlife, and wildlife live for the trees. That's their armour, their protection from people. If we take that away, we chase away the wildlife. Whether you're a hunter or just a wildlife admirer, it's important to have all those things and to be able to enjoy it. And I think Alternative 3 would allow everyone to enjoy what we have. Thank you.

HEARING OFFICER: Thank you, Miss Rhatchatourian.

Is there anyone else wishing to testify?

42A KAY WALKER: Thank you very much. My name is Kay Walker, and I'm the owner of Sunwest Yamaha, a motorcycle and snowmobile sales here in Idaho Falls. I'm also co-owner of RV Country, Incorporated, and I'm also the President of the Eastern Idaho Motorcycle Dealers Association.

Sitting here tonight listening to what's been said, I didn't know what this was all about, but I couldn't help but think that I had to come up here and

M-31 say a few things. I've been in the motorcycle and snowmobile business now for better than 15 years. I had a big operation down in Utah, and I saw the lands closed in there. I saw the people get shut out from using these, and consequently I've seen many, many dealerships - - in fact last winter alone, five of them go bankrupt, strictly because there's no place to use their machines.

My business puts a lot of money in this economy, and there's a lot of businesses in this valley that operate snowmobile sales, service, and employ a lot of people. I think that the money, the economic impact of this is very important. I think that the

42B wildlife is important.

I had the pleasure when I was a young boy to spend one whole summer in the wilderness area of Utah with no sleeping bag, no tent, nothing, no guns. I mean I have been in the wilderness. I know all about it. I also know, like has been said here tonight, that the animals are probably more afraid of the individuals without the motorized vehicles than they are with them, particularly in the wintertime.

M-31 cont.

But I really think the economic thing is the big issue here. We overlook that this is the snowmobile capital of the world. We're right here in West Yellowstone in this area where all the snowmobile manufacturers do their testing. We have people come here from all over the world to go snowmobiling, and I think it's important that the information which I don't have with me here tonight because I was unaware of this meeting, is obtained from the Idaho Travel Council on how much money is brought into the State of Idaho through snowmobiling and trail riding to the point that we, as the Idaho Trail Riders Association and the Dealer Association, contributed money to help the Idaho Travel Council promote trail riding in the State of Idaho, because it brought in more money than skiing or a lot of other things. And I think those figures are crucial to

42C the decision that's made on this tonight. I believe, like has been said, there has to be land management, and that land management has to be very carefully thought of. But I think we also have to consider everyones' needs and the economic impact of closing this land.

I would say for my people that I've talked to and the people whose views that I represent, we are definitely in favor of Proposition 3. Thank you very much.

HEARING OFFICER: Thank you, Mr. Walker.

Is there anyone else now wishing to testify? Yes, would you come forward and state your name and who you represent, please?

43A KEN SHEPHERD: My name is Ken Shepherd, and I'm totally unprepared for this, because this meeting was kind of - - nobody ever knew it was coming off until all of a sudden. I own a cabin in Island Park, and I have snowmachines; I have a boat. I don't have any motorcycles anymore, because they're hard on my back. I used to ride dirt bikes, but the area up there where we have a cabin is totally unaccessible in the wintertime unless you have a snowmachine. You can ride a snowmachine up there for hours and hours and hours and never see any of these animals that people are saying we're going to scare away or hurt. They're smart; they're

43B already down lower.

But to close that area off and say you can only get there except on cross-country skis or snowshoes is ridiculous. I would lay odds the amount of people would go to Kay Springs on cross-country skis or snowshoes, you couldn't count ten a year. I backpack, and I'll tell you what, to backpack seven miles or four miles is hard to do. And Kay Springs is straight up and a long ways. Nobody's going to walk there in the wintertime, and I'll bet you very seldom people do it even in the summertime. So to shut the area off to people that want to use it on snowmachines or even maybe a few motorcycles is totally wrong. If you want to have the trails and say that you have to stay on the trails, that's one thing. That's a good way to do it. They do that in the primitive area right now in the Frank Church area. You can drive in there 45 miles into that area. It's a wilderness area, but you have to stay on the trails with your outfits. That's all right, but to totally shut off that area up there, which I bet you there ain't a handful of people in this town ever been up on top the Centennials any other way than on a machine of some type. I just don't think that we should shut that off to everybody.

That's all I have to say.

HEARING OFFICER: Thank you, Mr. Shepherd.

Is there anyone else wishing to make a statement or testify? Are there any additional written statements?

Being as there are no indication of further testimony at this time, I will call a recess until 9:15 p.m. when the hearing will resume.

We appreciate your participation in this portion of the hearing, and I'd like the record to show that the hearing was recessed at 8:45 p.m.

(A brief recess was taken.)

HEARING OFFICER: This hearing opened at 7:05 p.m. today and recessed at 8:45 p.m. The hearing is now reconvened. Let the record show that it is now 9:15 p.m.

Is there anyone else wishing to testify? Are there any additional written comments? As there are none, this phase of the hearing is over.

Closing the record, I would like to remind you again that the testimony received at this hearing will be available in the form of a transcript, and if you wish to purchase copies, please leave your name and address with the Court Reporter.

You are also reminded that all testimony will be analyzed and a written record of that analysis will be prepared and will be available at the BLM and Forest Service office in Butte and Dillon, Montana, and at the Forest Service office in St. Anthony, Idaho. The analysis of this testimony will be used to determine what changes, if any, will be made in the EIS and Wilderness Suitability and Nonsuitability Recommendations. The final recommendations will be forwarded to the President following concurrence and signature by the Secretaries of the Interior and Agriculture.

The hearing is now closed; however, the record shall remain officially open until June 19th, 1987. The Forest Service and BLM will continue to receive written statements during this period. All such statements postmarked on or before June 19, 1987, will be included in the final decision. Comments should be sent to the Butte District Office, Bureau of Land Management, Post Office Box 3388, Butte, Montana, 59702.

We wish to thank you for your time and interest in these issues and for your very candid and informative comments. Time for the record is 9:20 p.m.

(The hearing was adjourned.)

REPORTER'S AFFIDAVIT

STATE OF IDAHO)
) ss.
County of Bonneville)

I, KAREN KONVALINKA, do hereby certify that I am an Official Certified Shorthand Reporter and a Notary Public for the State of Idaho;

That I took down the proceedings aforesaid at the time and place therein named and thereafter reduced the same to typewriting under my direction and control.

I further certify that I have no interest in the event of the action.

WITNESS MY HAND AND SEAL this the ____ day of June, 1987.

(Signature)

Karen Konvalinka, C. S. R.,
Notary Public in and for the
State of Idaho, residing at
Idaho Falls, Idaho.

(Seal)

My commission expires: Perpetual

44A

United States Department of Agriculture
Agricultural Research Service
General Services Division
Beltsville, Maryland 20705

June 11, 1987

Mr. Phil Gezon
Project Manager
Butte District Office of the BLM
P.O. Box 3388
Butte, Montana 59702

Dear Mr. Gezon:

The Agricultural Research Service (ARS) has reviewed the draft Environmental Impact Statement (EIS), dated February 1987 for its impact on the U.S. Sheep Experiment Station (USSES). The following comments are provided.

E-2

- o Under Alternatives Two and Eight, all land to the south would be designated as wilderness. Although it is stated, under both Alternatives, that access to the USSES through these lands would continue to be maintained, ARS is concerned about how this would be done. Will access be designated for Government use only; will the location of the road be convenient for USSES operations; would road closure be proposed for certain times of the year; which agency would fund road maintenance, etc? If either Alternative is selected, the Act of Congress so designating the wilderness area must provide for the ARS access.

O-20

- o It is felt that the draft EIS has failed to assess, in accordance with the National Environmental Policy Act (NEPA), impact of wilderness classification on ARS holdings. (BLM assessed impact of ARS holdings on wilderness classification only.) Areas of impact would include reduced human activity on wilderness lands; increase in wildlife population; access to adjacent lands for locating stray/missing sheep; etc. (See NEPA Regulations 1502.16.)

- o In various portions of the EIS (pp. 55 and 62, for example), comments are made on the negative impact of ARS holdings on wilderness classification. Specific data needs to be cited in support of these statements. (See NEPA Regulations 1502.22.)

O-11

- o The Management Framework Plan, dated September 10, 1979, and identified as Appendix D, references the "SEA" or the Science and Education Administration. The Agricultural Research Service is the appropriate Agency identifier. Please make this correction.

  The Plan is nearly 8 years old and has not been updated to reflect the statutory change in land management responsibilities effected in 1981. In addition, given the age of the Plan and the date of the draft EIS, it is not understood how the Plan can be used to substantiate/support current impact analyses. (See NEPA Regulations 1502.18(b).)

44B

O-11 cont.

The Plan includes statements on ARS' unwillingness to cooperate. First, how are these statements relevant to the context of a Wilderness Study, the scope of which does not include the USSES. Second, we have nothing in our files to indicate "a failure to cooperate." The BLM needs to produce documents or correspondence to support claims which appear to be unsubstantiated. Further, the reference to having the issue of "lack of ARS cooperation" resolved at the Washington level (p. 112) is unknown. Was recent contact made with ARS?

- o The enclosed letter dated October 29, 1980, signed by the then Director of BLM has application to the draft EIS/Appendix, particularly paragraph three which states that BLM does not advocate revocation of the ARS public domain land withdrawal. The letter contradicts statements made in the draft EIS. The inconsistency in BLM position needs to be addressed.

In summary, it is our feeling that if there are concerns over the manner of ARS land management, those concerns need to be openly discussed. Please feel free to contact me. My telephone number is FTS 344-1028 or Commercial (301) 344-1028. My address is: USDA-ARS, Room 321, Building 003, BARC-West, Beltsville, Maryland 20705.

Sincerely,

SUSAN K. ROTH
Chief
Real Property Management Section

Enclosure

cc:
D. Nason
J. Fitzgerald

44C

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

From Laird NOH

OCT 29 1980

Honorable John Melcher
United States Senate
Washington, D. C. 20510

Dear Senator Melcher:

I understand that you received a letter from Mr. Ronald A. Michieli on behalf of the Public Lands Council, National Cattlemen's Association, and National Wool Growers Association, concerning recent actions of the Bureau of Land Management (BLM) with respect to the 16,650 acres of summer range in the Centennial Mountains, Montana, withdrawn in 1922 for use by the U.S. Sheep Experiment Station, which is operated by the Science and Education Administration (SEA) of the Department of Agriculture.

I believe it is important for the BLM to communicate directly with you on this subject, because Mr. Michieli's letter contains erroneous information. We are preparing a detailed response to the information sheet enclosed by Mr. Michieli, which originated with SEA, and we will send you this response as soon as possible. At this time, we would like to set the record straight on the three major points raised by SEA and reflected in Mr. Michieli's letter. This letter also serves as the response promised you by our State Director in Montana.

First, the SEA contends that the BLM is attempting to revoke Executive Order 3767, which withdrew 16,650 acres of summer range for the U.S. Sheep Experiment Station. I assure you that the BLM favors the SEA's sheep research program. It is vital to the sheep industry, and it should be continued. We do not advocate revocation of the Executive order, but we must review the withdrawal pursuant to Section 204(1) of the Federal Land Policy and Management Act (FLPMA), as explained below. The revocation issue was last raised and settled in 1978, when the Montana Wilderness Association petitioned the Department of the Interior for revocation of the Sheep Experiment Station withdrawal. On June 22, 1978, that petition was denied by the Deputy Assistant Secretary, Land and Water Resources. Since that time, the BLM has been working with the SEA to develop a new interagency agreement providing for management and protection of all the resources in the area through cooperative action by both Agencies.

The SEA quotes from a 1975 memorandum of the BLM State Director, Montana, advocating revocation. That proposal was superseded by the Deputy Assistant Secretary's decision in 1978. The SEA also quotes from a BLM recommendation in our Dillon Management Framework Plan (MFP) advocating revocation. However, that was a staff-level recommendation at MFP Step 1 by the wildlife specialist, and it was subsequently rejected by the District Manager in his MFP Step 3 decision on September 10, 1979. There is no BLM decision or policy in effect that advocates revocation.

44D

We want you to be aware that the question of continuation of the withdrawal will come up again in the future. Although BLM is not seeking a revocation of the withdrawal, this does not relieve BLM of the statutory requirement, under Section 204(1) of FLPMA, to review all public land withdrawals which closed lands to appropriation under the Mining Law of 1872. The withdrawal review of this particular withdrawal has not yet been scheduled, but it must be conducted sometime prior to October 21, 1991, the deadline given in FLPMA. We will, of course, seek comments in detail from SEA and the public as an essential part of that review.

Second, the SEA contends that the 16,650 acres of summer range withdrawn by Executive Order 3767 are not public lands administered by the BLM and therefore are not subject to the requirements of Section 603 of FLPMA -- the wilderness review provision. We respectfully disagree. We hold extensive consultation with the Solicitor, Department of the Interior, on this question. Executive Order 3767 withdrew 16,650 acres of public lands to be used by the Department of Agriculture for the sole express purpose of experimental sheep grazing. The Executive order did not transfer the overall management of these public lands to the SEA. Moreover, Congress has not authorized the SEA to carry out the diverse management activities that are conducted on these lands affecting wildlife, fire control, recreation, rights-of-way, and other activities aside from sheep grazing. Consequently, all management decisions affecting the 16,650 acres in question, except those pertaining to experimental sheep grazing, are the responsibility of the BLM. The Associate Solicitor, Energy and Resources, has prepared a written legal opinion to this effect, and a copy is enclosed.

Because the lands qualify as public lands under the terms of FLPMA, we are obligated to treat them under section 603 in the same manner as BLM has treated all 176 million acres of public land it administers in the contiguous Western States. The lands must be subjected to wilderness inventory. If they are found to have wilderness characteristics, as defined by the Wilderness Act, the lands must receive a wilderness study, culminating in recommendations to the President and ultimately to Congress, as to whether they are suitable or nonsuitable for preservation as wilderness.

Federal Land Policy Management Act.

Third, the SEA contends that a wilderness designation for the 16,650 acres of summer range would interfere with the research conducted by the Sheep Experiment Station. We believe that conclusion is premature. SEA is clearly wrong in stating that under wilderness designation BLM could arbitrarily eliminate grazing; Section 4(d)(4)(2) of the Wilderness Act directs that grazing "shall be permitted to continue" where it was established before an area was designated as wilderness.

A more valid question is whether SEA's use of motorized vehicles, pesticides, and herbicides would be compatible with wilderness designation. The BLM is currently developing its wilderness management policy, which will address these topics. One of the questions we have raised with the Solicitor with respect to wilderness management is the applicability to the BLM of the grazing guidelines that appear in the Conference Report on the Central Idaho Wilderness Act of 1980. These guidelines provide for the

44E

continuation of grazing and various supporting activities, including certain uses of motor vehicles, in wilderness areas. Should the BLM adopt a management policy along the lines of those grazing guidelines, the SEA's use of motor vehicles might be compatible with wilderness designation. If the SEA's use of pesticides and herbicides proves to be incompatible with BLM's wilderness management policy, we would consider recommending special legislative provisions in any proposed wilderness legislation for this area to ensure that the SEA practices could continue -- analogous to the special provisions for cobalt mining in Section 5(d)(1) of the Central Idaho Wilderness Act.

I want to emphasize that BLM has come to no conclusions as to whether the Summer range lands should or should not be recommended for wilderness designation. That decision lies far down the road. The final wilderness inventory decision has not yet been made on the affected lands. If the area does become part of a wilderness study area, as a result of the inventory, it would then receive a comprehensive wilderness study, in which the BLM land use planning process is used to analyze all the alternative land uses for the area. The public, the SEA, and all other interested Federal, State, and local agencies would have the opportunity to participate in that wilderness study.

In conducting the wilderness review, BLM is making an effort in good faith to recognize and cooperate with the SEA's sheep and range research on these lands.

I hope the above information will clear up any possible misunderstanding of our intentions. Please let me know if you have questions on this subject.

Sincerely yours,

Director

Enclosure

cc: Mr. Michieli

44F

Identical letters sent to the following:

Honorable John Melcher
United States Senate
Washington, D. C. 20510

Honorable Max S. Baucus
United States Senate
Washington, D. C. 20510

Honorable Pat Williams
House of Representatives
Washington, D. C. 20515

Honorable Ronald Marlenee
House of Representatives
Washington, D. C. 20515

Honorable James A. McClure
United States Senate
Washington, D. C. 20510

Honorable Steven D. Symms
House of Representatives
Washington, D. C. 20515

Honorable George V. Hansen
House of Representatives
Washington, D. C. 20515

Honorable Morris K. Udall
House of Representatives
Washington, D. C. 20515

Honorable John F. Seiberling
House of Representatives
Washington, D. C. 20515

Honorable Dale L. Bumpers
United States Senate
Washington, D. C. 20510

Honorable Keith G. Sebelius
House of Representatives
Washington, D. C. 20515

Honorable Henry M. Jackson
United States Senate
Washington, D. C. 20510

Honorable Mark O. Hatfield
United States Senate
Washington, D. C. 20510

45A

DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER
1114 COMMERCE
DALLAS TEXAS 75242

11 March 1987

Mr. Dean Stepanek
Montana State Director
Bureau of Land Management
222 North 32nd Street
P.O. Box 36800
Billings, Montana 59107-6800

Dear Mr. Stepanek

Thank you for allowing us the opportunity to review the Centennial Mountains Wilderness Draft Environmental Impact Statement, in the states of Idaho and Montana.

We continue to express our support of the BLM in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently, Air Force air operations including instrument flight training route IR 313 does traverse the western portion of the Dillon Resource Area (BLM) study area. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

Mission requirements, fuel costs and environmental constraints determine the decision to locate military training activities. Because of general aviation and population pressures, low level high speed flights are relegated to areas which are least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how planning and management decisions made by your agency may adversely affect or restrict use of low altitude airspace by the military. The Air Force position on this matter is based on the high training and readiness values rendered by use of this low altitude airspace.

We are aware of your fire suppression activities requiring the use of aircraft, therefore, our flight crews are cautioned to remain alert for your fire suppression activities especially during the normal fire season and they are directed to avoid such activity by at least 5 nautical (5.76 statue) miles.

45B

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntmyer, (214) 653-3341, or FTS 760-1341.

Sincerely

ELTON D. SCHEIDEMAN, Colonel, USAF
Regional Civil Engineer

Copy to:
HQ USAF/LEEV

Ronald C. Prichard
Forest Supervisor
Beaverhead National
Forest

Mr. John Bangs
Forest Supervisor
Targhee National Forest

46A

UNITED STATES
DEPARTMENT OF
AGRICULTURE

Soil
Conservation
Service

Federal Building-Room 443
10 East Babcock
Bozeman, MT 59715

May 6, 1987

Darrell McDaniel
Project Manager
Butte District Office
Bureau of Land Management
P. O. Box 702
Butte, MT 59701

Dear Mr. McDaniel:

We received a copy of the Centennial Mountains Wilderness Study/Environmental Impact Statement, dated February 1987.

We understand the proposed action is for Alternative 1 which recommends that lands occupied by our snow courses and SNOTEL sites become wilderness.

O-14 Lakeview Canyon snow course is located in Sec.26, T14S, R2W, and was established in 1948.

Lakeview Ridge snow course (new and old) and Lakeview Ridge SNOTEL are located in Sec.27, T14S, R2W. These sites are authorized under Right-of-Way Reservation Serial Number 33661 and Memorandum of Agreement between Bureau of Land Management and Soil Conservation Service.

We assume that we will be able to maintain and service these sites with motorized vehicles under our current Right-of-Way Reservation, even if the area is designated wilderness or that wording will be included in the wilderness bill that will permit operation comparable to the Right-of-Way Reservation. Your confirmation of these assumptions would be appreciated.

We do appreciate the opportunity to review and comment on this Wilderness Study/EIS.

Sincerely,

GLEN H. LOOMIS
State Conservationist

47A

United States
Environmental Protection
Agency

Region 8, Montana Office
Federal Building
301 S. Park, Drawer 10096
Helena, Montana 59626-0096

EPA

REF: 8MD

June 19, 1987

James Moorhouse
District Manager
Butte District Office of the BLM
P.O. Box 3388
Butte, MT 59702

Re: Centennial Mountains Wilderness Study / Environmental Impact Statement

Dear Mr. Moorhouse:

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, the Region VIII Montana Office of the Environmental Protection Agency has reviewed the referenced draft environmental impact statement (EIS).

EPA reviews an EIS for the impact or the proposed action on EPA-administered programs, such as those under the Clean Water Act and Clean Air Act. In addition, while outside of EPA's regulatory purview, EPA also reviews the process that was used in developing the EIS in order to ensure that a credible, thorough process was followed. This allows for full consideration of potential environmental impacts and benefits that can be used by members of Congress in determining appropriate wilderness designations. Designation of public lands for wilderness preservation in most instances, is fully consistent with Clean Water Act and Clean Air Act requirements.

The Centennial Mountains Wilderness Study includes areas within Idaho and Montana which fall under the jurisdiction of EPA Region X and Region VIII respectively. Both Regions have reviewed this document and we are presenting our joint comments for your consideration at this time.

In evaluating the alternatives presented in this EIS, we are concerned that the preferred alternative does not provide the greatest degree of protection of the air and water quality within the study area. Specific comments provided by the principal reviewers from EPA Region X and Region VIII are attached. The following is a summary of our concerns:

> The discussion of elk habitat impacts are unclear. Different figures for acreage impacted by timber harvesting are provided in the DEIS. It is difficult for EPA to assess this impact.

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> The DEIS does not fully describe the potential impacts of disturbance of unstable soils on water quality. EPA is concerned that these disturbances, which are not fully defined, will cause violations of water quality standards over both the short-term and long-term. The DEIS should also describe monitoring and mitigation plans.
>
> The DEIS should assess potential water quality and other environmental impacts resulting from possible development in the drainage area that feeds the on-site and off-site wetlands below Red Rocks Lakes.
>
> The DEIS should have provided a complete examination of potential impacts of oil and gas development and mineral development on groundwater. The DEIS provides only a brief discussion.
>
> The DEIS describes the economic value of development, but does not provide a similar description for the value of environmental quality (e.g., fish, wildlife, drinking water). These latter qualities should be estimated. Also, the assumptions used to develop the economic analysis should be provided for all resource developments considered here. This analysis should include a complete discussion of the gross economic factors affecting the value of each resource.
>
> The criteria for determining the geographic boundaries of the various alternatives is not provided. Therefore, it is difficult to assess whether these alternatives provide an appropriate range of options for this study area.
>
> Potential air quality impacts from development of mining, logging or oil and gas leases are not addressed for any of the alternatives. Presumably these actions could impact the Class II air quality designation for this area. These impacts and appropriate mitigation need to be fully addressed.

In accordance with the criteria that EPA has established for rating draft environmental impact statements, we have rated this draft EIS as category EC-2 Environmental concerns - Insufficient information.

We would like to receive a copy of the Record of Decision when it is available. If you need further EPA assistance, please feel free to contact Lee Shanklin of my staff at (406) 449-5414 or FTS 585-5414.

Sincerely,

John F. Wardell

John F. Wardell, Director
Montana Office

Attachment

cc: Phyllis Williams, 8PM-EP
Gerald Opatz, Chief, Environmental Review Section
Region X
Dean Stepanek, BLM
Ronald Prichard, Beaverhead Forest
John Burns, Forest Supervisor

47C

Attachment 1

Comments on Centennial Mountains Wilderness Draft Environmental Impact Statement (DEIS)

Gerald Opatz
Chief, Environmental Review Section
Region 10
Seattle, Washington 98101

Principal Reviewer: Steve Bubnick FTS 399-8512

There appears to be several unanswered questions in this DEIS. Most of them are pertaining to the selection of the preferred alternative.

G-3 In Chapter 4, "Environmental Consequences," on page 49 it is mentioned that "wilderness designation may aid in the long-term maintenance of important elk habitat." We agree. Yet on page 52, in a discussion on effects on wildlife habitat, they state that 10,700 acres of elk fall and winter habitat are recommended for wilderness designation and a total of 5,500 acres of present similar habitat are not. At the close of the first paragraph on page 52, the DEIS states that 5,500 acres of "elk habitat may be disturbed in the short-term by timber harvest". Timber harvest will cause the elk population to be displaced from this area for "25-30 years," until these conifer forests become restored to a suitable habitat state. The affects of this amount of acreage of habitat loss to the elk population in the area should be addressed in the final EIS. Included in the discussion should be the size of the population affected and the average life span of the Rocky Mountain Elk. This information would assist in accurately determining the significance of the impact and the relative term of impact.

G-4 There is a difference in the amount of affected acres of elk habitat and the certainty of the impacts, as reported on page 52. The first paragraph shows 5,500 acres that "may be disturbed" by timber harvest, yet the second paragraph under the conclusion sub-heading shows 6,100 acres that "would be logged." Exactly what combination of acreage and certainty is it? This ranges from a possible 34% of elk fall and wintering habitat to a definite 38% of habitat disrupted. Even the abstract of alternative 1 on page ii gives a different amount of elk habitat to be impacted by the proposed alternative. These contradictions should be corrected in the final EIS.

The effects of development activity under the preferred alternative are discussed on page 53. Of the 72,885 acre Wilderness Study Area (WSA), unstable soils have been identified upon 35,303 acres (48%). It is stated that of the 35,303 acres of unstable soils, "a total of 16,811 acres of unstable soils may be disturbed by development activity," and that "erosion and slumping would continue at present levels on 18,492 acres." What are the

J-2 present levels of erosion and slumping? If the entire 35,303 acres are

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47D

J-2 cont. disturbed, either naturally or by human activity, impacts to habitat and water quality would be quite widespread and potentially significant. Over what period of time would this disruption be expected to occur and will these soil impacts cause violations of water quality standards. What kinds of development activities are considered when discussing these potential soil disturbances? Depending on the activity, the disturbance may be widespread or localized, short-term or long-term. This subject needs to be clarified. Also, are there any monitoring and mitigation plans proposed regarding these soil and water quality impacts? These questions should be addressed in the final EIS.

The abstract to alternative 1 on page ii mentions that "15% of the drainage inside the study area that feeds both on-site and off-site wetlands below Red Rock Lakes may be developed." Fifteen percent of the drainage is a significant amount. However, activities in this portion of the drainage would have a much greater and far-reaching impact on the downstream ecosystems. How will this affect water quality?

More importantly in this portion of the pre-discussion summary, an impact to "trumpter swan and fisheries habitats in Montana" is given a brief mention. The problem lies in that the DEIS fails to expound the effects of these activities upon the trumpeter swan. Moreover, it only again briefly mentions affecting the "cutthroat trout habitat by increasing erosion" and sedimentation (see page 53, sub-heading conclusion). To what extent is the trout habitat "adversely" affected? These topics should be fully detailed and all impacts disclosed in the final EIS.

O-19 Private land is listed as an impact to the wilderness area on the map "impact to Wilderness Values" included in the back of the DEIS. It certainly would affect solitude, among other things. Since private land within one-half mile of a wilderness area is a degradation to wilderness values, why is the preferred alternative one which borders the overwhelming majority of private land in the area? This should also be explained in the final EIS..

N-2 Oil and gas exploration and mining activities could seriously impact groundwater in a region of sensitive aquifers. On page 33, the brief discussion on groundwater says the quality is "generally good." However, the DEIS makes no mention of these activities' impacts on the groundwater. Instead, the DEIS discusses the impacts of a wilderness designation on mineral and energy development. A discussion of all possible impacts to the groundwater should be included in the final EIS, for all alternatives. As an aside, depending on the amount of activity that has occurred in the area since 1979, the findings of Pettyjohn, et. al., may not be valid today. This issue should be addressed in the discussion about groundwater impacts.

O-19 cont. Finally, what is the basis used to choose the geographical boundaries of the various alternatives? For example, the proposed alternative is most of that WSA north of the continental divide, but not all. Why not? What is the distinguishing feature that excludes the northwestern portion of the study area from becoming part of alternative 1? Also, each time the land in the

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O-19 cont. Beaverhead National Forest was considered in an alternative, it was considered in its entirety. But not so for Bureau of Land Management (BLM) or Targhee National Forest land. Why not? What were the criteria for choosing the bounds of each alternative? The answers to these questions should be discussed to give a better understanding for the consideration to environmental quality that was given in choosing viable alternatives for areas to be designated as wilderness.

Alternative 2 (all wilderness) would be the environmentally preferred alternative and would result in the greatest water quality protection. Wilderness status precludes exploitation of the nation's non-renewable resources by protecting "reserves" for future generations to administer as they see fit. In addition, protection of water quality and fish and wildlife habitat improves with wilderness designation. Cattle, timber, and mining interests, while of potential importance to local economies, need to be balanced against the total resource needs of future generations.

M-16 The proposed action, as well as many of the other alternatives of the DEIS, favors commodity development. The economic value of the commodities is clearly stated for each alternative. But what is not clear is the value of environmental quality; fish, wildlife, and botanical habitats; high quality drinking water; archaeological sites; and, scenic and aesthetic attributes. The final EIS should include a discussion of how these natural values are compared to the quantifiable commodity values and how they are factored into the suitability determination.

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Specific Comments on the Draft Centennial Mountains
Wilderness Study/Environmental Impact Statement

Environmental Protection Agency
Region VIII, Montana Office

Principal Reviewer: Lee Shanklin
FTS 585-5414

M-17 Page ii, Summary: Alternative 2, paragraph 3 states "present leases represent potential impact on 33% of unstable soils. However, development is not likely during the life of the leases." Since it is unlikely that these leases would be developed in any case, how was this accounted for in the assessment of economic impacts? Restrictions on leases under any alternative would presumably be of little economic impact if it is unlikely that they would be developed at all.

J-6 Page ii, Summary: Alternative 2, paragraph 3 states "...but on the other hand, no soil stabilization projects would be allowed. Therefore, only natural slumping and erosion will continue to add sediment to Red Rock Lakes." Page 33, Surface Water, paragraph 2 and 3 indicate that "...historic overgrazing on public lands increases the turbidity levels." "...elevated suspended sediment concentration of 35 mg/l. This value is above the concentration of 25 mg/l which is known not to cause adverse effects in aquatic life." Based on these statements it would appear that 1) at least some causes of the sediment and erosion problems are not natural, and 2) the impact may be significant enough to warrant mitigation regardless of the chosen alternative.

B-1 Page 30, Projected Visitor Trends, paragraph 2: "Wilderness designation would not substantially reduce existing opportunities for off-road vehicle use during the summer season." "The one exception would involve snowmobile use which could increase in some areas" appears to contradict the statement in the Summary, page ii, Alternative 2, paragraph 2 which states that "no recreation vehicle access will be allowed and all current snowmobile use will be eliminated."

N-1 Page 32, Mineral Resource Projection, paragraph 2 and 3: The marketability of the mineral resources listed in paragraphs 2 and 3 should have been projected in the same manner as phosphate resources. Evaluation of the value and feasibility of resource development should include gross economic considerations such as the projected marketability of the particular resource and costs associated with site specific developments (i.e., full costs of development; transportation; measures necessary to mitigate environmental concerns; current and projected commodity levels nationally and locally and market projections).

47G

Page 41, Economic Condition, paragraph 3: This discussion is based on the recommended timber harvest conditions, how accurately does this reflect the actual situation? How much timber is currently supplied from this area to support jobs in the local mills? What are the long and short range projections for the timber market in these areas? These would be more accurate indicators of the economic importance of the resource than the volumes of available timber.

M-17 cont.

Also, this section does not address the current or potential oil and gas leases. If they are not a factor in the economic conditions of the area then perhaps the relative availability of acreage for leases should not be factored into the economic consideration of the various alternatives as presented on the Summary section. This gives the appearance that the loss of these leases creates a negative economic impact, but this does not appear to be documented elsewhere in this EIS.

O-19

Page 51, Alternative 1, proposed action, Effects on Wilderness Values: First full paragraph states, "on lands not recommended for wilderness, wilderness values will generally be retained." This statement should be more fully explained. What is the rationale for not designating an area to wilderness if the intent is to retain wilderness values in that area. How will this be accomplished? Similar statements appear elsewhere and should likewise be clarified (i.e., page 52, Effects on Wildlife Habitat, column 2, conclusions: "However, on most of the lands not recommended wilderness, wildlife values would remain the same".)

L-3

Page 52, Effects on Range Resource, conclusions, paragraph 1: This section states "there would be no significant impact on permittees use of vehicles because primitive means of transportation are used for livestock grazing management. This is inconsistent with the discussion on the use of motorized vehicles and potential impacts as described on page 57, Column 1, paragraphs 1 and 4.

Section 4, Environmental Consequences - General Observation

Potential air quality impacts from development of mining, logging or oil and gas leases are not addressed for any of the alternatives. Presumably these activities could impact the Class II air quality designation for this area. This issue should be addressed in the final EIS.

As observed in EPA Region 10's review of this EIS, no clear rationale is provided for the differing geographical boundaries of the various alternatives. Is this based solely on the economic considerations of various development strategies, is protection of sensitive areas key rationale or some combination? This is unclear and makes comparison of the relative advantages or disadvantages difficult.

47H

Timber harvest availability seems to be an important factor in the difference between some alternatives. However, as observed previously the marketability of this resource should be considered in evaluating its value. The potential of a maximum of 22 jobs (by 1995) based on the availability of the resource alone is possibly misleading. It is unlikely that this potential would be reached under any of the alternatives unless favorable market conditions exist.

O-9

There is no discussion on mitigation of adverse impacts under any of the alternatives. This includes those activities already permitted or existing within the boundaries of the study area. It is difficult to evaluate the relative adverse impacts from various developments without an assessment of the potential for mitigation at a given location.

As discussed on page 33 in the Water and Soils sections, some adverse effects on streams within the study area are already documented and the potential for more erosion and sedimentation is noted under all alternatives. Regardless of the alternatives selected, consideration needs to be given to compliance with the Clean Water Act and applicable State water quality standards. Best Management Practices (BMP's) must be implemented when activities causing non-point source pollution take place. Fisheries and water quality impacts from land developments must be monitored to assure that BMP's are effective and protect beneficial uses. Section 303 of the Clean Water Act and Title 40, Code of Federal Regulations, Part 131 include antidegradation requirements. The antidegradation policy provides: 1) at a minimum, all existing uses and the level of water quality necessary to protect these uses needs to be fully maintained and protected; 2) where higher quality waters exist, such quality needs to be maintained unless certain minimum requirements are met before allowing lowered water quality; and 3) in Outstanding National Resource Waters, no lowering of water quality is allowed. We recommend that the EIS contain a discussion of these water quality antidegradation requirements and define how wilderness management or multiple use management for the proposed action and alternatives will help achieve these conditions. Similarly, the EIS should also address nondegradation requirements and applicable Water Quality Standards for ground water and surface water.

Of the alternatives presented in this EIS, Alternative 2, All Wilderness, is the most protective of the environment. Alternative 2 will most closely comply with the provisions of the Clean Air Act, Clean Water Act and other programs administered by the EPA.

The major effects noted for this alternative include:

1) Reduction in snowmobile and off-road vehicle use, primarily about 6,350 acres of suitable snowmobile terrain in the Odell Creek Canyon.

2) Lost opportunity to increase livestock grazing by 375 AMUs.

47I

3) Possible incremental increased expense and inconvenience to livestock permits in some areas due to vehicle restrictions.

4) A potential of 2.64 mmbf per year on 13,200 acres would not be realized.

5) Table 4-6 shows the potential for one less livestock related job under Alternative 2 vs. the No Wilderness Alternative.

The final EIS should address some of the issues in light of the following considerations:

B-1 cont.

Item 1. If no other adverse wildlife or environmental concerns would result, it might be possible to exclude the Odell Creek Canyon (6,350 acres) or some similar area from wilderness designation and to allow snowmobile recreation while maintaining other wilderness values through sound management practices. Some consideration needs to be given to the elevated sediment levels in Odell Creek (p. 33, Surface Water), and to possible causes and remediation techniques as appropriate before a final decision is reached.

M-18 cont.

Items 2. and 3. These elements are not discussed in a consistent enough manner in each alternative to allow comparison of the relative economic values or impacts between alternatives, i.e., Alternative 1 states that current vehicle use is already primitive while Alternative 2 alludes to more extensive use of motorized vehicles. The effects of the geographic boundary differences between alternatives and their relationship to livestock management areas are unclear. Discussion of economic considerations fail to document the importance if any of these increase AMU's or the severity of the consequences of vehicle restriction to existing local livestock producers.

Item 4. The potential number of jobs created (22) in direct relationship to the amount of timber available for harvest without consideration of market conditions both locally and nationally probably over estimates the potential loss of employment due to wilderness designation. It is also noted on page 72 under General Impacts that any of the alternatives would probably have a minimal effect on existing employment in the local mills or in the community's stability in general. The relative economic value of this resource compared to the potential environmental impacts from logging in the area is questionable based on the information provided in this EIS.

M-18 cont.

Item 5. The relationship of the number of jobs to the factors on the livestock industry presented here is unclear. Only Alternative 2 shows a difference in the number of jobs potentially available. What is the rationale for this relationship? Is it consistently evaluated among all the alternatives? What is the significance, if any, on the local livestock economy?

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UNITED STATES GOVERNMENT

memorandum

DATE: JUN 19 1987

REPLY TO ATTN OF: Division of Programs, Land and Minerals, Code 360 *

SUBJECT: Centennial Mountains Wilderness Study/Environmental Impact Statement (Draft)

TO: District Manager, Bureau of Land Management
Butte, Montana

FROM: Billings Area Director

This office has accomplished a cursory review of the draft Environmental Impact Statement. Due to the geographic locale of the study area, and proximity to any reservations under the jurisdiction of the Billings Area Office, we will not comment.

However, thank you for the opportunity to review the document.

Attachment

* USDI, BIA
Billings Area Office
316 North 26th St.
Billings, Montana

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

49A

6840

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Endangered Species, Field Office
Federal Bldg., U.S. Courthouse
301 South Park
P.O. Box 10023
Helena, Montana 59626

IN REPLY REFER TO:
M.02 Centennial Mountains
Wilderness Study

May 7, 1987

MEMORANDUM

To: Resource Area Manager, BLM, Dillon Resource Area, Dillon, MT

From: Acting Field Supervisor, FWS, Endangered Species, Helena, MT

Subject: Biological Assessment for the Centennial Mountains Wilderness Study/ Draft Environmental Impact Statement (DEIS)

We have reviewed the subject DEIS and your biological assessment and determination of " o effect" to listed species. These species are the threatened grizzly bear (Ursus arctos horribilis) and the endangered peregrine falcon (Falco peregrinus).

We concur with your no effect determinations for these species. If conditions of the proposed action should change or Congress should modify the proposed action such that these or other listed species may be adversely affected by wilderness designation, then you should reinitiate consultation with this office.

Thank you for your efforts to conserve listed species.

cc: ES, FWS, Billings, MT

RAC/clh

MAY 1987
RECEIVED

"Take Pride in America"

50A

United States Department of the Interior
FISH AND WILDLIFE SERVICE

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:
WR-AWA
MAIL STOP 60130

JUN 0 9 1987

District Manager
Butte District Office
Bureau of Land Management
P.O. Box 33BB
Butte, Montana 59702

Dear Sir:

We appreciate the opportunity to comment on the Draft Centennial Mountains Wilderness Study/Environmental Impact Statement, and compliment the authors of this very readable document.

We strongly support the implementation of the preferred alternative and the designation of about 26,248 acres as wilderness. Such action is appropriate and complementary to the Red Rock Lakes Wilderness Area, the Red Rock Lakes National Wildlife Refuge, and the Centennial Valley.

O-16 We would recommend, and believe it appropriate under provisions of the Wilderness Act, to include the 16,650 acres currently used as a U.S. Department of Agriculture Sheep Experiment station in this wilderness proposal. As an integral part of the watershed, these lands should be made a part of the overall proposal. We believe that such action would not preclude continuation of the experiment station's programs, but would denote the special character of these lands. Should the station's programs be discontinued in the future, the area would already be identified within the wilderness boundaries and would automatically become a portion of the wilderness.

Enclosed are our general and specific comments on this document. Again, we thank you for the opportunity to comment on this proposal. We request that our comments be made a part of the Wilderness record.

Sincerely,

Robert W. Young

Acting Regional Director

Enclosure

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COMMENTS - DRAFT CENTENNIAL MOUNTAINS WILDERNESS
STUDY/ENVIRONMENTAL IMPACT STATEMENT

GENERAL COMMENTS

Overall, the continued viability of the Centennial Mountains Wilderness Study Area (WSA) is critical to the future of many fish and wildlife species, and for esthetic and amenity values on the Red Rock Lakes National Wildlife Refuge (Refuge).

H-1 Indeed, to many wildlife species, the two areas are utilized as one contiguous block of habitat. Elk and moose freely move between the areas as their needs dictate. Other species such as the great gray owl are dependent on the old-growth timber on the Refuge and adjacent WSA as primary habitat. The centennial Valley, of which the Centennial Mountains WSA is an integral part, is considered by the Nature Conservancy to be one of the most biologically complete areas remaining in Montana.

The overriding resource which sustains this enormous diversity of life is a continuous supply of clean, high-quality water most of which is produced annually in the Centennial Mountains.

Wetlands in the Centennial Valley, off the Refuge as well as on, are highly productive of waterfowl such as trumpeter swans, geese, and ducks. Accelerated siltation of Red Rock Creek, Centennial Valley wetlands, or Lima Reservoir through ill-planned development of the Centennial Mountains could have disastrous consequences for waterfowl and other species dependent on wetland habitats.

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Lima Reservoir is especially important for waterfowl. It is the most important molting area for trumpeter swans and Canada geese in the Rocky Mountain west. Any further degradation of this already shallow reservoir would have negative impacts on waterfowl values.

Endangered Species, such as the peregrine falcon and bald eagle which are nesting species in the Centennial, are dependent on waterfowl produced in Valley wetlands as a primary food source. The Valley is also the most important nesting area for greater sandhill cranes in the State of Montana.

I-4 In addition, Red Rock Creek provides habitat for Arctic grayling, a native fish which has been designated as a "Species of Special Concern" by the Montana Department of Fish, Wildlife and Parks. The grayling are found only in Red Rock Creek and in the Big Hole River as natives in the continental United States. The species is critically dependent on high-quality riparian habitat and clean water for survival.

J-5 The quality of the watershed, while generally acceptable at the present time, is extremely fragile. The Centennial Mountains possess highly erodable soils perched on unstable slopes. Even in their natural condition, some slumping is presently occurring. Past mining, road construction, and sheep grazing in the Odell Creek watershed, adjacent to the WSA, have caused tons of silt to erode into the Upper and Lower Red Rock Lakes and Lima Reservoir over the years. This soil movement has had a significant negative impact in the Refuge's aquatic systems. Protection of the watershed is critical to the future productivity of the Refuge and wetlands in the Centennial Valley.

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G-1 The protection of big-game security cover throughout the WSA is also extremely important. The Centennial Mountains provide a long, narrow band of big-game habitat located in the two adjoining States. Disturbance to this habitat reduces security to the animals and encourages movement across State lines to avoid hunting pressures, which reduces recreational values to users on both sides of the State line.

The movement of big-game such as moose and elk is common from the highlands of the Refuge throughout the WSA in both Montana and Idaho. Any major disturbance to security cover by logging and roading existing habitats may have a negative impact on these big game animals' use of the Refuge.

The connection of the WSA to the existing Red Rock Lakes Wilderness has positive impacts on both units from an esthetics standpoint. The Refuge had been designated a National Natural Landmark by the Department of the Interior in addition to its wilderness status. A portion of the Refuge adjacent to the WSA in the Sheep Mountain area is also designated a Research Natural Area. In our view, it is essential that the scenic and esthetic qualities of the WSA be maintained to complement the esthetic and amenity values of the Refuge.

J-5 cont. After a review of the Draft Environmental Impact Statement (EIS), we feel the preferred alternative gives basic protection to Refuge values, although it falls short of protecting watershed areas for migratory bird habitat in the western end of the Centennial Range. The values of Lima Reservoir are significant on a regional basis from a trumpeter swan and goose standpoint. The maintenance of the Reservoir's entire watershed is critical to its future, not only to migratory birds but to agriculture as well.

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Overall, the Fish and Wildlife Service supports the implementation of the preferred alternative to protect the multitude of values arrayed in the Red Rock Lakes Refuge.

SPECIFIC COMMENTS

Page 25. Inclusion of the U.S. Sheep Experiment Station

The Sheep Experiment Station should be included in the wilderness study. Station lands are managed by the U.S. Department of Agriculture and are an important part of the Centennial Mountains. These lands, which form critical watershed areas of the Refuge, should be included in any wilderness suitability study.

Page 52, 1st Column, Paragraph 7

It is our opinion that moose would not benefit by logging in the Centennial Mountains. In an area such as the Centennials with large amounts of nonforest habitats, the remaining secure forest cover is of considerable importance to moose. Most winter moose habitat in the Centennials is associated with narrow mountain stream riparian habitat with coniferous cover nearby, or significant willow riparian stands such as occur in the Refuge on the valley floor.

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The harvest of any timber adjacent to riparian habitats would be detrimental to moose. Little regeneration of browse species important to moose in existing clearcuts in the Centennial Range has been observed. What little beneficial habitat is developed through clearcutting is ephemeral in nature. This is further offset by the increased road construction necessary to accomplish the logging which further reduces security for moose. The illegal kill of moose in the area is already unacceptably high without further reducing security habitat.

The current moose herd which uses the Refuge and the WSA in the Centennials is one of the most productive in the continental United States, with twinning being a common occurrence in the herd. The value to the demand by sportsmen is extremely high as two record-class bulls have been harvested in the past 4 years on or near the Refuge.

The optimum option for moose habitat in the Centennials is to manage riparian areas for maximum willow production and expansion while preserving stands of adjacent coniferous forest for security and escape cover. In a region dominated by as much nonforest cover type as the Centennials, any disturbance to existing moose security cover and development of roads which aid access into moose habitats should be avoided.

Page 52, 2nd Column, Paragraph 4

I-1 Logging in that portion of the western Centennials not protected under this alternative may increase siltation into streams and associated wetlands, as well as Lima Reservoir. Any increased siltation into these aquatic habitats would further reduce food production for trumpeter swans and other waterfowl.

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I-1 cont. Aquatic macrophites in Red Rock Creek above Lima Reservoir are critically important to swans as a food source during the spring and fall. Lima Reservoir is the most important molting habitat for swans in the tri-state region. In addition, other migratory birds such as Rocky Mountain Canada geese are heavily dependent on Lima Reservoir as a molting site. A lack of protection for highlands in the western Centennials may have a negative impact on migratory birds through decreased water quality in the region.

Page 56, 2nd Column, Paragraph 4

Again, the comments concerning the positive values of logging on moose habitat in the Centennial Mountains is questionable.

Page 125, 2nd Column, Paragraph 2

K-4 The sentence in that paragraph which relates to an 85-year rotation for determining a yield per acre of timber is questionable. The short time span for rotation is surprising considering Bureau of Land Management clearcuts harvested in the 1960's in the Centennials above the 7L Ranch have not properly regenerated more than 20 years later.

51A

IDAHO
FISH & GAME

600 South Walnut • Box 25
Boise, Idaho 83707

April 27, 1987

Mr. Phil Gezon
Project Manager
Butte District Office of the BLM
P. O. Box 3388
Butte, MT 59702

Dear Mr. Gezon:

Idaho Department of Fish and Game personnel have reviewed the Centennial Mountains Wilderness Draft Environmental Impact Statement and have no objections to the alternatives discussed in the document.

Thank you for the opportunity to comment.

Sincerely,

Jerry M. Conley
Director

JMC:CHN:tlv

cc: Region 6

EQUAL OPPORTUNITY EMPLOYER

52A

IDAHO STATE HISTORICAL SOCIETY
610 NORTH JULIA DAVIS DRIVE BOISE, 83702

HISTORIC PRESERVATION OFFICE
210 Main St
(208) 334-3847

April 9, 1987

Mr. James A. Moorhouse
District Manager
Butte District Office
Bureau of Land Management
P.O. Box 3388
Butte, Montana 59702

Dear Mr. Moorhouse:

Thank you for forwarding a copy of the Centennial Mountains Wilderness Draft Environmental Impact Statement for our review and comment.

We reviewed the DEIS and, in particular, the cultural resource section on page 32. We are in agreement that although few sites have been recorded on the study area, the archaeological potential is high. For this reason, we believe a cultural resource management plan much like the one implemented for the Frank Church River of No Return Wilderness would provide suitable protection of the cultural history of the area. Through such actions as site inventory and evaluation and site monitoring, maintenance and interpretation much of the area's cultural values can be protected and enhanced while still protecting its wilderness values.

We shall, at some point, be interested in reviewing the management direction proposed for the Centennial Mountains Wilderness study area. Please let us know if you require additional information or have any questions regarding our comments.

Sincerely,

Thomas J. Green
Deputy State Historic
Preservation Officer

TJG/bhd

cc: Jim McDonald, Targhee National Forest Archaeologist

53A

State of Montana
Office of the Governor
Helena, Montana 59620
406-444-3111

TED SCHWINDEN
GOVERNOR

June 22, 1987

Mr. James Moorehouse
District Manager
Butte District Office
Bureau of Land Management
P. O. Box 3388
Butte, Montana 59702

Dear Mr. Moorehouse:

The State of Montana appreciates the opportunity to review and submit comments on the Bureau's Centennial Mountains Wilderness Study/Draft Environmental Impact Statement.

The Bureau is to be complemented for producing a concise and easily read study document. The organization of the document and appendices was especially helpful in understanding the issues and information available regarding the study area and the Bureau's evaluation of management alternatives.

The attached comments were prepared from comments submitted to my office by those state agencies participating on the Governor's Planning Task Force. The Planning Task Force routinely reviews federal planning documents and were briefed on the Centennial Mountains Wilderness Study by members of your staff in February of this year.

Thank you again for the opportunity to comment on your agency's study and draft EIS.

Sincerely,

Ralph Driear
Administrative Assistant

Enclosure

cc: Marvin Lenoue
Acting State Director
Bureau of Land Management
P. O. Box 36800
Billings, Montana 59107

53B

STATE OF MONTANA COMMENTS
ON
BUREAU OF LAND MANAGEMENT'S
CENTENNIAL MOUNTAINS WILDERNESS STUDY
DRAFT ENVIRONMENTAL IMPACT STATEMENT

The Governor's Interagency Planning Task Force reviewed the Bureau of Land Management's Centennial Mountains Wilderness Study and Draft Environmental Impact Statement (DEIS). The following comments were compiled by the Governor's Office from written comments received from the Department of Fish, Wildlife and Parks; State Lands-Division of Forestry; Agriculture and Commerce.

The study document/DEIS is clearly written and presents necessary information in a manner helpful to the reader. The frequent use of information tables is especially appreciated and very useful in understanding the agency's consideration of various management and impact-related alternatives for the Centennial Mountains Study Area.

The Bureau's proposed wilderness alternative would result in a wilderness area 28 miles long, with a width ranging from one-quarter mile to about two and one half miles. While portions of this area undoubtedly posses significant wilderness qualities, the configuration constraints of the proposed wilderness boundaries significantly lessen its viability when compared with other public lands being considered for wilderness designation in southwestern Montana.

While the Montana Department of Fish, Wildlife and Parks generally supports the Bureau's proposed wilderness alternative, all commenting state agencies share the management related concerns expressed in Appendix H of the DEIS: "The subdivision of the land south of the Continental Divide by roads into discrete segments, the existence of the two large sheep experimental station inholdings with the ongoing vehicle supported agriculture experiment activities, the valid phosphate mining claims with numerous and conspicuous signs of past mining operations and the exclusions for phosphate mining remains and watershed contour furrowing adversely affect long term manageability." In addition, Appendix H concludes that the Bureau's proposed wilderness alternative will have manageability-related impacts greater than five of the eight management alternatives evaluated in the DEIS. The commenting state agencies do agree, however, that the important wildlife and watershed values of the area require that special attention

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and protection be provided for these resources in the future management of the study area.

M-26 An additional concern regards the potential economic impacts associated with the Bureau's proposed wilderness alternative. The proposed alternative is relatively economically restrictive when compared with other management alternatives, ranking fifth of eight in producing local jobs and income. In comparison with alternative 4, with allows 26,619 acres for wilderness and the full Montana-side amount of 13,000 acres for commercial timber management, the proposed alternative provides fewer wilderness acres (26,248) and only 3,000 acres for commercial timber harvest.

Relevant management plans from the three federal management agencies propose 2.64 mmbf of commercial timber harvest annually from the study area, not withstanding the results of the wilderness proposal. The proposed Centennial Mountains Wilderness alternative includes annual timber sales of only 0.6 mmbf annually. In addition, regardless of the wilderness decision, no commercial timber sales are planned for either the Targhee National Forest portion of the study area in Idaho, or the Beaverhead National Forest portion of the study area in Montana. Since the study document concludes that Montana Timber would most likely be used in Montana, Montana timber producers would lose 77 percent of the available timber from the study area.

In the February, 1985, issue identification brochure distributed by the Bureau of land Management and the Forest Service, and included as Appendix A to the study document, the question is asked: "How important is the timber in this area to local economies?" Aside from the discussion on page 72 of the study document that states: "No alternative discussed in this document would, by itself, cause closure of local mills or create large layoffs", the document does not provide the information necessary to answer this very important question. In addition, the above text does not address the need to view these individual agency decisions (regarding timber harvest restrictions) in context with the cumulative economic impacts associated with other recent Forest Service timber harvest decisions in the area. An assessment of the cumulative impacts to the area's timber harvest-related economy is needed to put the effect of the proposed significant harvest restrictions in perspective with the local and regional economic setting.

O-7 The five state sections adjacent to the wilderness proposal may all be eventually exchanged with the Bureau. Section 36, T14S, R1E, and Section 36, T14S, R3W are currently included in an exchange proposal between the Department of State Lands and the Bureau. It is anticipated

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that Section 36, T14S, R1W will include in a second phase exchange between the agencies. The remaining state-owned sections in Odel Creek and Bean Creek may be exchanged if suitable Bureau lands are offered.

54A

State Historic Preservation Office
Montana Historical Society
Mailing Address: 225 North Roberts • Helena, MT 59620-9990
Office Address: 102 Broadway • Helena, MT • (406) 444-7715

March 26, 1987

Mr. Phil Gezon
Project Manager
Bureau of Land Management
Butte District Office
P.O. Box 3388
Butte, MT 59702

Re: Draft Centennial Mountains Wilderness Study/Environmental Impact Statement.

Dear Mr. Gezon:

O-1 Thank you for submitting the document cited above for our review and comments. We do not believe the DEIS adequately considers cultural resources as part of the affected environment or in terms of the environmental consequences of the proposed alternatives. We realize that current knowledge about cultural resources in the considered area is incomplete. However, we believe the information currently available about cultural resources within the considered area, and bolstered with what we know of surrounding areas, can be organized and described much more effectively for predictive purposes and for the purposes of the document. To that end, we recommend that the following questions be addressed to establish the condition of the current data base and to assess the impacts that may be anticipated under each considered alternative:

1). Of the 26 sites recorded in the 72,885 acre area, how many are listed on the National Register? How many have been determined ineligible? How many require additional work to resolve eligibility?

O-2 2). How much of the area under consideration has been inventoried for cultural resources? How many acres remain unsurveyed?

O-3 3). How many National Register quality sites may be reasonably expected in the considered area? Where are these likely to be located in relation to the various alternative areas?

O-4 4). What impacts to cultural resources may be anticipated under each alternative in relation to projected levels of impacts from various types of development (eg., oil and gas, logging, spring developments, soil stabilization)? Note that neglect of a property resulting in its deterioration or destruction is considered an adverse effect (36CFR800.9b).

54B

Gezon
March 26, 1987
Page 2

These data should allow meaningful consideration of cultural resources as part of this study effort.

Sincerely,

Alan L. Stanfill,
Deputy SHPO/Agency Review

File: Comp/BLM/Butte/1987

55A

Fremont County
Commissioners

June 8, 1987

Jim Moorhouse, District Manager
Butte District Office of BLM
P.O. Box 3388
Butte, Montana 59702

Dear Mr. Moorhouse:

E-1 Fremont County Commissioners are submitting these comments on the Centennial Mountains Wilderness Study because some of the lands lie within Fremont County boundries.

Being a rural County we realize the importance of the land base on our rural economy. We feel the study area has important multiple uses. The opportunity for sustained yeild timber harvest, valid mineral claims, livestock allotments, hunting, snowmobiling, off road vehicle, hiking, horseback riding, recreational uses, and the sheep experiment summer range. Wilderness severly restricts many of these uses which in turn increases these uses on other lands to their detriment.

We feel that additional wilderness lockup on this area is not necessary. We feel that the land managers FS & BLM have the expertise and desire to manage the lands to their greatest potential. The fact that these lands qualify for study attest in large part to past management.

Recognizing the commitment to try to balance uses and needs and protect Red Rock Swan Refuge, we would support Alternative One even though it would mean some economic loss in the area.

Two enclosures again express our concerns regarding this issue.

Sincerely,

Fremont County Commissioners

Enclosures

55B

USER GROUPS ARE CONCERNED WITH WILDERNESS AND YELLOWSTONE ECOSYSTEM PROPOSALS

Idaho Public Land Users Association, Blue Ribbon Coalition, Idaho Trail Machine Association, Idaho Falls Gem and Mineral Society, Federal and Idaho elected officials, and citizens representing agriculture and livestock are concerned about the proposals being made by coalitions and environmental groups that are attacking the multiple-use and sustained-yield philosophy that was mandated by our United States Congress in 1960. They feel, such groups have little or no interest in the economy of any of the Western States or the welfare of our people.

Contacts have been made with elected officials of all 44 Idaho Counties on the major problems that they and other officials in the West face. As officials in the Western Region of our United States, they are dedicated to these states' rich heritage which includes the natural beauty, natural resources, water, minerals, timber, and grass for livestock.

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MORE WILDERNESS WILL CUT SCHOOL AND COUNTY FUNDS

Idaho counties and schools depend heavily upon revenues derived from land-based industries such as timber, mining, and agriculture to generate funding for education of our youth and for basic public services.

Wilderness classification of our public lands destroys job opportunities in timber production, harvest, mining activities, and agricultual pursuits such as livestock grazing. This, also, applies to workers who supply products from raw materials and workers who provide goods and services. Loss of their jobs would be at great cost to present and future generations, and there is actually concern that this might happen. Property owners and local elected officials are concerned especially in the West where a large percentage of land is owned by the federal government.

Of the forest receipts received, 70 percent goes to the county road and bridge and 30 percent goes to schools. County road and bridge receives 10 percent and schools receive 90 percent of the mineral receipts.

56A

The SHOSHONE-BANNOCK TRIBES

FORT HALL INDIAN RESERVATION

Land Use Director .... (208) 238-3824
Assistant Director .... (208) 238-3825
Water Resources Engineer (208) 238-3827
Secretary .... (208) 238-3823
Planning Aide .... (208) 238-3823

LAND USE
P. O. BOX 306
FORT HALL, IDAHO 83203

June 10, 1987

JUN 1 2 87

Mr. Phil Gezon, Project Manager
Butte District Office
Bureau of Land Management
P.O. Box 3388
Butte, Montana 59702

RE: Centennial Mountains Wilderness Study/EIS

Dear Mr. Gezon:

We have reviewed the Centennial Mountains Wilderness Study/EIS and would like to submit the following comments. The major areas of concern are the adequacy of the assessment in determining the effects of wilderness designation; the assumptions operative in the IMPLAN Model; appropriate mitigation measures; and specific detailed concerns.

A-1
M-11 Page 30 and 56 contain statements that wilderness designation would increase use initially, but such increase would quickly return to predesignation levels. These statements are unsubstantiated by the facts presented in the EIS, and are merely opinion at this point. For example the data presented on page 30 indicates a 25% increase in use of the newly designated Red Rock Lakes National Wildlife Refuge Wilderness from 1981 to 1983. This is a significant increase in visitor use.

The EIS goes on to analyze the regional demand for wilderness on page 42. Here it states that "growth in population will have a major impact on demand for wilderness. The Centennial Mountains are located in the fast growing northwest region, so increases in demand for all resources available on federal land including wilderness recreation can be expected." This statement certainly counters the statements made on pages 30 and 56 that use will quickly return to predesignation levels. On the contrary it is extremely likely that wilderness designation will result in significant long-term increase in visitor use of the area. This has important ramifications for the economic analysis of the various alternatives.

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M-12 This EIS does not give an adequate evaluation of the economic contribution that wilderness designation would bring to the local and regional economy in terms of increasing visitor use of the Centennials. Nor does it give an adequate picture of the tradeoffs involved. For example on page 56 it states that 596 recreation visitor days of snowmobile use would be lost, yet no mention is made of the important contribution to recreation visitor days that may be created by wilderness designation. There is a growing body of scientific literature analyzing wilderness trends and values that should be consulted and used to formulate conclusions in the EIS. Unbuttressed opinions on these important issues are inimical to the analysis process. The issue of what positive impacts to the local economies might be realized with wilderness designation and to what degree would they offset other loss of income (Appendix A page 83) has not been adequately analyzed.

Page 54. The validity of the IMPLAN model as used in the analysis is questionable. It is well known and documented that recreation creates many indirect economic benefits derived from guide services, lodging, food service, gas and related supplies. Income from these sources are not accounted for. The Appendix should contain a brief summary of the IMPLAN Model assumptions and the data (or summary of data) input into the model. The figures in Tables 4-3 through 4-8 have little meaning because it is impossible to know how they were derived or to determine their validity.

O-12 One of the major components of an EIS is the inclusion of appropriate mitigation measures 40 CFR 1502.14(f) and 1502.16(f) and 1502.16(h). In some cases mitigation is offhandedly mentioned in the EIS - such as allowing wild fires to burn in wilderness areas to offset habitat losses to advanced seral stages and an elimination of logging or habitat manipulation (page 57). This type of mitigation should be developed in much more detail for each adverse effect as a result of wilderness designation. For example the loss of 100 RVDs as a result of the closure of the Odell Creek Canyon loop trail to snowmobile use could be compensated for by developing an alternate trail in suitable terrain out of the designated wilderness area. Appendix L lists BMPs suitable for mitigating some of the impacts of roading and logging only. Nothing is mentioned for mitigating the impacts of wilderness designation. The lack of developing these mitigation measures for wilderness designation skews the consequences of wilderness designation unfairly in a negative direction and hence reduces the both the overall liklihood of

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O-12
cont. obtaining any type of wilderness designation or at best reduces the total amount of wilderness protected.

H-1 Page 56. It is stated that black bear, mule deer, moose and blue grouse would be adversely effected by wilderness designation by eliminating the early seral stages created by logging. While that is true, much can be offset by allowing wildfires to burn in wilderness areas - this was mentioned for improving livestock grazing on page 57 and certainly holds true for wildlife. The EIS must also take into consideration the negative impacts that logging can produce on wildlife from increased roading and disturbance (page 57).

L-1 Chapter 4. Effects on Range Resource - all alternatives. The desirability of increasing or maintaining current levels of livestock grazing in the Centennial Mountains is questionable. On page 33 it is stated that highly erodible soils compounded by historic overgrazing have increased turbidity levels. Water quality in Red Rock River has deteriorated to the point that aquatic life and recreational uses are suffering. Other drainages are also suffering water quality deterioration from previous management policies on grazing, logging and roading. One of the major benefits of wilderness designation under all alternatives is the benefit to water quality from the elimination of logging and the maintaining of grazing at low levels. This must be mentioned in the analysis.

M-32 Chapter 4. Effects on the Timber Resource - all alternatives. The EIS has not addressed the critical issue of deficit timber sales. It is indeed a worthy goal to protect local economies. A small number of timber related jobs are secured as a result of what amounts to government subsidy of uneconomical timber programs on government land. When the economics of deficit timber sales are combined with the negative impacts of timber management (erosion, slumping, water quality deterioration, loss of sensitive species habitat, wildlife disturbance and visual quality deterioration), it is extremely difficult to justify the decision to forego wilderness for continued "management".

Chapter 4. Effects on Unstable Soils - all alternatives. The fact that mechanized watershed project maintenance will be eliminated by wilderness designation must be weighed against the negative impacts of continued logging, roading and mining practices. Wilderness designation on watersheds will have a beneficial impact overall by eliminating damage caused by roading and logging.

56D

J-8 In many cases, statements made in the introductory summaries of the alternatives on pages i to iv are not carried through in the supposedly more detailed Environmental Consequences. For example, in Alternative 1 page ii it states that erosion and slumping may increase on 48% of the unstable soil, and another statement that 15% of the drainage may be developed and affect trumpeter swan and fisheries habitats. There is no readily apparent connection between these statements and those that appear in the Environmental Consequences - Chapter 4 for Alternative 1. No where is it mentioned in Chapter 4 that trumpeter swan habitat could be adversely impacted. No where does it explain why increased slumping on 48% of the unstable soils will not impact water quality.

We believe that the above shortcomings have led to a serious understatement of the beneficial effects of wilderness designation to both the Centennial Mountain ecosystem and to the social and economic welfare of people in the Region.

We appreciate the opportunity to comment on this EIS.

Sincerely,

Susan Ball
Environmental Coordinator

57A

NORTHWEST CANCER CENTER
ONCOLOGY • HEMATOLOGY
1560 NORTH 115TH STREET, SUITE G16
SEATTLE, WASHINGTON 98133
(206) 365-8252

CHARLES M. BAGLEY, JR., M.D.
ROBERT F. LANE, M.D.

March 9, 1987

Phil Geson, Project Manager
Butte District Office of BLM
P. O. Box 3388
Butte, MT 59702

Re: Centennial Mountains Draft EIS

Dear Mr. Geson:

Thank you for having supplied me with this Draft EIS. I have followed this wilderness area study closely.

I favor alternative #2 or #6.

The proposed alternative #1 simply includes inadequate amounts of wilderness area, so as not to be considered a realistic alternative. This is most evident in the more western section around Range 38 East and 39 East, where the proposed wilderness area is as narrow as a half mile wide in a few places. This plainly cannot be considered an adequate protection of any kind of wilderness. Likewise, on the far eastern end in Range 42 East and thereabouts, the amount of wilderness protection in the preferred alternative constitutes a strip only a mile and a half wide or less. There is no really contiguous area that gives any sense of solitude from surrounding intrusion potential. Alternative 6 and alternative 2, however, do preserve the maximum possible wilderness within these critical areas. All of the other alternatives are simply unrealistic and cannot be considered any real protection of wilderness.

There is further evidence from the map in the appendix that the amount of timber cutting that would be foregone by inclusion of the entire eastern end as wilderness, as shown in alternatives 2 or 6, would be minimal. There would be very little timber cut and lost thereby.

Thank you for the opportunity of responding to this draft.

Sincerely yours,

Charles M. Bagley, Jr., M.D.

210/29

58A

6/6/87

SIXTY-THREE RANCH
LIVINGSTON, MONTANA
59047

James Moorehouse
P.O. Bx 3388
Butte, Mt.

JUN 1 2 '87

Dear Sir

Please, accept this as comment about the magnificent Centennial Mountains & include in hearing record.

That ecosystem needs to remain intact. The Mountains nourish Red Rocks Refuge. They are as one.

The great Trumpeter Swans hang on by a thread. Water fluctuation destroys their nests. Very few cygnets become adults.

I love visiting them. I'm a native Montanan & seeing swans & cranes is a thrill besides the other wildlife & beautiful scenery. So very restful to visit.

This area does not need to be logged or roaded. Please, don't.

Sincerely, Sandra Cahill

59A

LANDMARK INSURANCE CORPORATION
33 BARKLEY CIRCLE S.W.
FORT MYERS, FLORIDA 33907 • 813/936-4042

May 21, 1987

Mr. James Moorehouse, District Manager
Butte District - BML
P.O. Box 3318
Butte, Montana 59702-3388

RE: Redrocks Lakes National Wildlife Refuge

Dear Mr. Moorehouse:

I have reviewed the Bureau of Land Management and U.S. Forest Service Wilderness Subsidy Study and Draft Environmental Impact Statement for the Centennial Mountains Wilderness Study area in Montana. I remind you that this is land that is unique within our country and belongs to all Americans. It is land that is the haven for waterfowl, including the trumpeter swan and habitat for the grizzly, elk, moose and deer. This land must be protected. I request that you support the following:

1. Total protection for the 92,000 acre Centennial Mountain Wilderness on both sides of the Continental Divide.
2. O-16 The Forest Service and BML revised the Draft Environmental Impact Statement to include wilderness suitability of lands owned by the Agricultural Research Service on the sheep experiment station.
3. I-1-2 Provide complete protection for the Centennial's water quality which is essential for arctic grailing, trout, and trumpeter swans as well as other waterfowl and wildlife.
4. The BML and Forest Service should revise the DEIS to evaluate the impact of development on wildlife, recreation and the scenic values and insure protection of these resources.

There is very little land and wildlife of this nature left, and it should be preserved and protected for all Americans. I request your support and help in this area.

Yours very truly,

Frank M. Gillingham

FMG/jts

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Hagenbarth Livestock (HL)
P.O. Box 1128
Dillon, Montana 59725
June 16, 1987

General comments on the Centennial Mountains Wilderness Draft Environmental Impact Statement.

The rationale used in addressing this EIS has been developed during three generations and 100 years of multiple use in the Centennial Mountains by the Hagenbarth Family. All of the Idaho Centennials have been grazed by livestock managed by Hagenbarth. It is gratifying to this generation that so much of the land that we and our predecessors used in the past under multiple use management is recognized by our environment cohorts as being in pristine condition and worthy of being defined as wilderness. This range condition is a credit to the past multiple use management by the Targhee National Forest and to the co-operating users. It is our belief that the Centennials can be best protected and can benefit all users to a greater extent under proper multiple use management. All the multiple use interests are at fault for the sad shape of the management of our environment. Through our use of the courts we have developed a bureaucratic nightmare which inhibits the present land managers from making rational and common sense decisions concerning our environment. Until rationality and common sense are restored to land management, the environment is going to suffer no matter who is managing and what interest is being managed for.

The Centennial Mountains is an ecosystem boarded by I-15 on the west and recreational development in Henry's Lake and Island Park on the east. The movement of wildlife within this ecosystem is basically north and south because of the high mountain summer range's location in relation to the winter ranges that lie both to the north and south. The notion that the Centennials connect the Yellowstone Ecosystem to the Selway-Bitterroot Wilderness is ludicrous considering the wildlife barriers on the east and west ends and the natural north-south wildlife migration. Such a statement severely damages the credibility of the environmental interests which seek management of the Centennials as wilderness.

As described above the Centennials are an ecosystem which includes all the lands of whatever ownership along both sides of the mountain range. This includes the Sheep Station lands and the Simplot mining claims, not to mention parts of the Targhee National Forest. The selection of the preferred alternative bears as testimony to the fact that the inclusion of the Sheep Station, Targhee National Forest lands and mining claims is not possible or practical because of the past, present and future uses and management of these areas. If the proposed alternative is picked, the management of the Centennial Ecosystem will be fragmented further.

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There are areas in the Centennials which have wilderness characteristics and should be protected as such. There are areas which are unstable and activities should be monitored, restricted or mechanically manipulated if needed and feasible. There is timber that should be managed and timber that should be left alone because of environmental consequences or quality and cost. There may be minerals which should be mined if economically feasible and environmentally acceptable. There is wildlife to be managed. There are goats to be planted. The excuse for not planting goats is rediculous. The impact of an occasional helicopter or vehicle is negligible and I may be mistaken, but I thought the grizzly and elk were plains animals and therefore unacceptable because they are unnatural to the area. There are a few fisheries, but not of a major nature. The only one of any significance is Blair Lake and it has been raped by the guided fishermen. In the Centennials there are areas where grazing should be better managed, where developments could better disperse livestock, where soils are unstable and grazing should be restricted, and areas where no grazing is allowed because impacts outweigh benefits, i.e., Hell Roaring area.

O-21 Any long term wilderness designation in the Centennials will only serve to fragment the ecosystem more and deteriorate the management thereof. The wilderness boundaries of this proposal and all other wilderness proposals in this EIS are so erratic that an expert would have difficulty following them. To identify this proposed wilderness on the ground to the public is an impractical task and would in itself destroy the natural qualities of the area. The travel restrictions imposed in Montana and Idaho pretty much protect those areas which have wilderness qualities, yet give the healthy and active public needed access to experience these qualities. As it is now, it is left up to the individual to determine if he or she is having a wilderness experience while touring the Centennial Ecosystem and I cannot see this significantly changing under carefully managed multiple use. Under any wilderness proposal the land is so fragmented that visitors would constantly be looking for signs telling them that they are having a wilderness experience. As far as demand of the public to experience the present wilderness qualities of the Centennials, other than during hunting season, in the last twenty years I have only seen one individual hiking in the area for recreation. This siting was made while managing our sheep allotments in 1967. With the exception of hunting and fishing on Aldous and Blair Lakes, there is very little recreational foot traffic in the south Centennials. There is snowmoblile traffic in the winter and I do not believe the ecosystem is damaged by this traffic, but because of the extreme avalanche danger in several areas, the BLM may be liable if said use was encouraged.

In recognizing the inability of the federal agencies to properly manage the Centennial Mountain Ecosystem under the multiple use concept, it is Hagenbarth Livestock's opinion that the proposed action is acceptable as a short term solution for the protection of those BLM areas that have wilderness qualities. In no way is HL supporting the wilderness concept in the Centennials by taking this stand. Although there are areas with wilderness qualities that need protection, we feel this protection should come through multiple use via travel, activity and use restrictions. Because of the bureaucratic red tape generated by special interest groups

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via the courts, the land managers of the various agencies cannot exercise the rationale and common sense needed to make the multiple use concept work. To compare the small fragmented areas of the wild in the Centennials (a lot less than 26,000 acres) to the established wildernesses in the U.S. is testimony to the fact that multiple use is not working and needs to be rejuvenated to consider every use, not just a single use. This will do more for the environment than the efforts of a single special interst group. The Hagenbarths have in the past and will continue in the future to protect and develop the Centennial Mountain Ecosystem using multiple use management. Hopefully we can all work toward a common goal and put rationality back into land management. A blaring example of this nightmare is the the inability of the federal agencies to control noxious weeds on federal range. If things like this are not corrected, all federal land, wildernesses, parks, or otherwise, will be purple and yellow, thanks to knapweed, spurge, and our especially our ignorance.

Sincerely,

James F. Hagenbarth

Representing:

Hagenbarth Livestock, a corporation; Margaret Hagenbarth & Sons, a partnership; Margaret Hagenbarth, David J. Hagenbarth, and self.

61A

June 8, 1987

Bill Gezon
Project manager
BLM office
Butte, Mont.

Dear Sir:

I am writing you regarding BLM's proposal to designate 26,000 acres for wilderness in the Centennial Mountains.

As a rancher and life long resident of Montana. I am totally oppossed to any more timber being designated for wilderness.

I feel the economy of Montana has suffered enough with the farming crisis - local small businesses and large retailers closing or moving out of the state is causing a very difficult situation on our economy. Now with more wilderness being proposed we will be faced with the closing of our sawmills which are a major employer and contributer to our economy.

What do we do with our over

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mature and allready dead timber we now have in our local forests?

I personally enjoy seeing a well managed forest rather than a stand of dead and dieing timber which is a eye sore to everybody.

I understand 90% of your timber designated for wilderness is classified mature - over mature.

My next question to you is what plans you may have for our economy the 6 months of the year that the tourists have gone back home to their homes and steady employment while were left here to enjoy our beautiful wilderness state trying to scrape out a living until the next year when the tourists arrive and save us for another year.

I support Alternative # 3 "No wilderness"

Sincerely
Roger Hamilton
Hamilton Ranches
Belgrade, Montana

62A

IDAHO POLE COMPANY
WESTERN LARCH • WESTERN RED CEDAR • LODGEPOLE PINE
BOX 1129 · BOZEMAN · MONTANA · 59715
BOX 670 · SANDPOINT · IDAHO · 83864

June 9, 1987

Bill Gezon, Project Manager
Centennial WSA
Bureau of Land Management
Box 3388
Butte, MT 59702

Dear Mr. Gezon:

Please enter this letter into the official record of the Centennial Mountains Wilderness Study Area.

I find it extremely disappointing to discover that the BLM has recommended over 26,000 acres of the study area for designated wilderness.

It is extremely difficult to comprehend how the BLM could recommend in excess of 35% of the study area as designated wilderness. With all of the designated wilderness already in existence on FS lands, all the S.393 study areas, State and National Parks, and other set-aside lands it is impossible to understand how the BLM concluded that we need more.

I believe there are over 18,000 acres of suitable timber in the study area of which roughly 90% is mature. It makes very little sense to contribute another 18,000 acres of fuel to "Natures Way of Timber Management".

Setting aside further land, timbered or not, as wilderness for recreation is also not justified. The latest FS statistics reveal what those of us on the ground already knew: RVD's for designated wilderness areas in the northern region have shown decline since 1982, (see attachment #1). There is no question that wilderness types of recreation are not the major form of recreation sought by visitors to Montana, (attachment #2).

It is very sad mistake for government to continue to set-aside huge parcels of potentially productive resources on the bet that wildlife and recreation will benefit. Wildlife benefit from proper management and recreation benefits are best achieved in a developed and/or motorized environment. The supply of non motorized recreation opportunity exceeds demand currently and far exceeds expected demand by 2030. Why then the emphasis on non-management by the BLM?

I can not support your recommedation for Alternative #1 due to the above reasons and the fact that it now becomes the duty of the Department of the Interior to address the issues of economics and community stability by prudent resource management. The FS has failed in this regard miserably as is shown by the dismal mess NFMA's planning process is in.

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I ask you to re-evaluate your priorities and respond to sound, rational and scientific facts and not to strong minority political pressures. Do not do as the Forest Service has.

We ask for you to reconsider Alternative #3 and recommend that as your preferred alternative.

Thank you for consideration of this comment.

Sincerely,

Vince Heier

Vince Heier
Timber Manager
Idaho Pole Company

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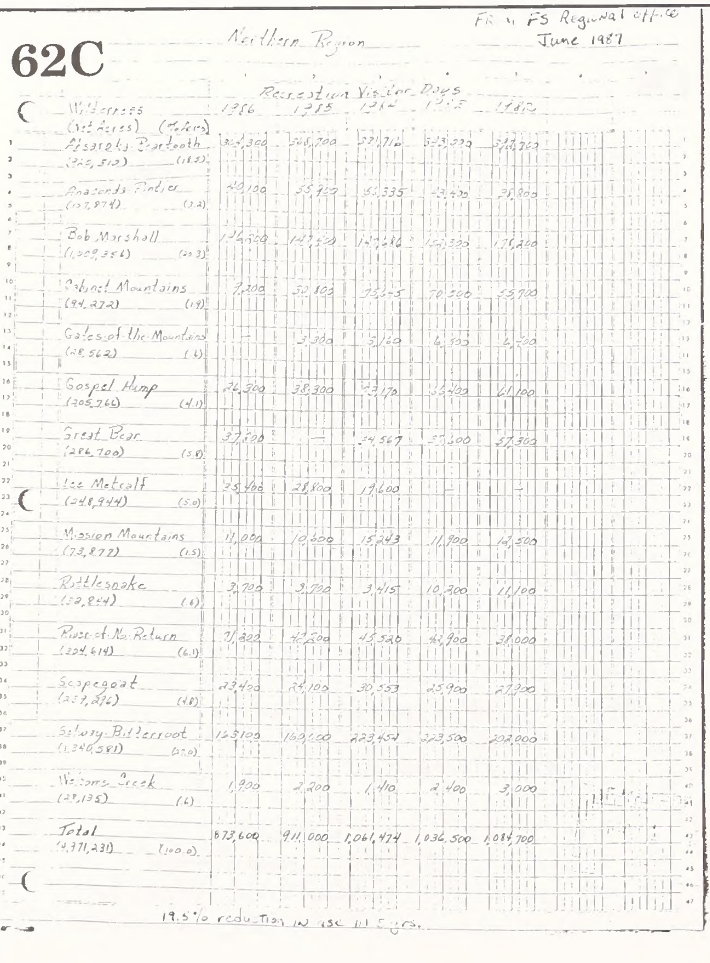

From FS Regional office
June 1987

Northern Region

Recreation Visitor Days

Wilderness (Net Acres) (% Acres)	1986	1985	1984	1983	1982
Absaroka-Beartooth (920,310) (18.5)	304,300	505,700	321,716	513,000	372,700
Anaconda-Pintler (157,874) (3.2)	40,100	55,900	53,335	43,400	38,800
Bob Marshall (1,009,356) (20.3)	124,800	143,400	147,686	150,300	176,200
Cabinet Mountains (94,272) (1.9)	7,200	50,800	75,675	70,500	55,700
Gates of the Mountains (28,562) (.6)	—	3,300	5,160	6,500	6,400
Gospel Hump (205,766) (4.1)	26,300	38,300	43,170	55,400	61,100
Great Bear (286,700) (5.8)	37,100	—	54,567	55,300	57,300
Lee Metcalf (248,944) (5.0)	35,400	28,800	19,600	—	—
Mission Mountains (73,877) (1.5)	11,000	10,600	15,243	11,900	12,500
Rattlesnake (32,844) (.6)	3,700	3,700	3,415	10,200	11,100
River of No Return (224,614) (6.1)	71,300	42,200	45,520	42,900	38,000
Scapegoat (239,296) (4.8)	23,400	24,100	30,553	25,900	27,900
Selway-Bitterroot (1,340,581) (27.0)	163,100	169,600	223,454	223,500	202,000
Welcome Creek (28,135) (.6)	1,900	2,200	1,410	2,400	3,000
Total (4,371,231) (100.0)	873,600	911,000	1,061,474	1,036,500	1,084,700

19.5% reduction in use in 5 yrs.

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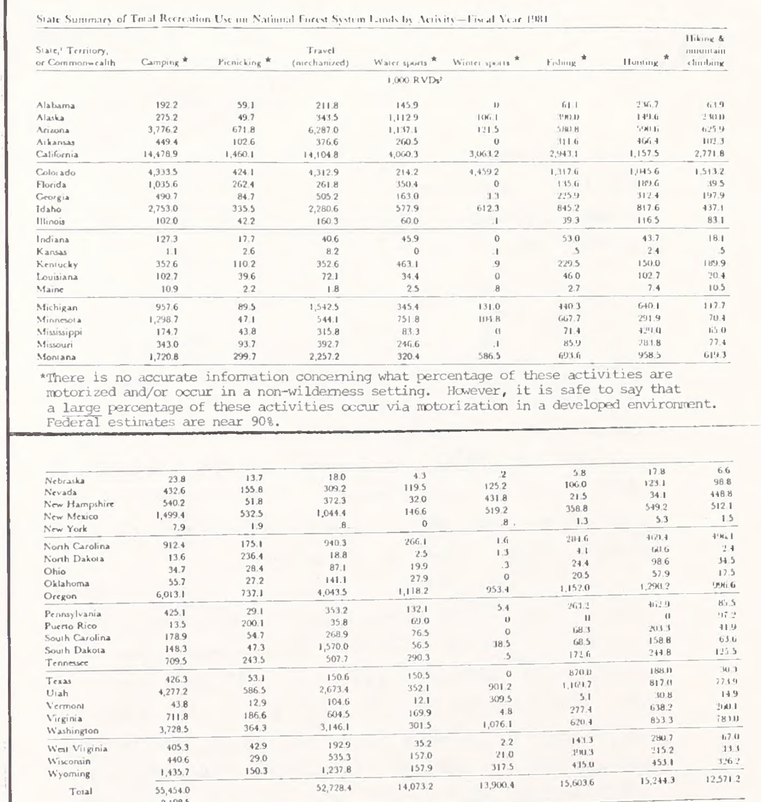

State Summary of Total Recreation Use on National Forest System Lands by Activity—Fiscal Year 1981

State,[1] Territory, or Commonwealth	Camping *	Picnicking *	Travel (mechanized)	Water sports *	Winter sports *	Fishing *	Hunting *	Hiking & mountain climbing
				1,000 RVDs[2]				
Alabama	192.2	59.1	211.8	145.9	0	61.1	236.7	61.9
Alaska	275.2	49.7	343.5	1,112.9	106.1	390.0	149.6	230.0
Arizona	3,776.2	671.8	6,287.0	1,137.1	121.5	580.8	590.6	625.9
Arkansas	449.4	102.6	376.6	260.5	0	311.6	466.4	102.3
California	14,478.9	1,460.1	14,104.8	4,060.3	3,063.2	2,943.1	1,157.5	2,771.8
Colorado	4,333.5	424.1	4,312.9	214.2	4,459.2	1,317.6	1,045.6	1,513.2
Florida	1,035.6	262.4	261.8	350.4	0	135.6	189.6	39.5
Georgia	490.7	84.7	505.2	163.0	1.3	225.9	312.4	197.9
Idaho	2,753.0	335.5	2,280.6	577.9	612.3	845.2	817.6	437.1
Illinois	102.0	42.2	160.3	60.0	.1	39.3	116.5	83.1
Indiana	127.3	17.7	40.6	45.9	0	53.0	43.7	18.1
Kansas	1.1	2.6	8.2	0	.1	.5	2.4	.5
Kentucky	352.6	110.2	352.6	463.1	.9	229.5	150.0	189.9
Louisiana	102.7	39.6	72.1	34.4	0	46.0	102.7	20.4
Maine	10.9	2.2	1.8	2.5	.8	2.7	7.4	10.5
Michigan	957.6	89.5	1,542.5	345.4	131.0	440.3	640.1	117.7
Minnesota	1,298.7	47.1	544.1	751.8	104.8	667.7	291.9	70.4
Mississippi	174.7	43.8	315.8	83.3	0	71.4	429.0	65.0
Missouri	343.0	93.7	392.7	246.6	.1	85.9	281.8	77.4
Montana	1,720.8	299.7	2,257.2	320.4	586.5	693.6	958.5	619.3

*There is no accurate information concerning what percentage of these activities are motorized and/or occur in a non-wilderness setting. However, it is safe to say that a large percentage of these activities occur via motorization in a developed environment. Federal estimates are near 90%.

State,[1] Territory, or Commonwealth	Camping *	Picnicking *	Travel (mechanized)	Water sports *	Winter sports *	Fishing *	Hunting *	Hiking & mountain climbing
Nebraska	23.8	13.7	18.0	4.3	.2	5.8	17.8	6.6
Nevada	432.6	155.8	309.2	119.5	125.2	106.0	123.1	98.8
New Hampshire	540.2	51.8	372.3	32.0	431.8	21.5	34.1	448.8
New Mexico	1,499.4	532.5	1,044.4	146.6	519.2	358.8	549.2	512.1
New York	7.9	1.9	.8	0	.8	1.3	5.3	1.5
North Carolina	912.4	175.1	940.3	266.1	1.6	204.6	409.4	496.1
North Dakota	13.6	236.4	18.8	2.5	1.3	4.1	60.6	2.4
Ohio	34.7	28.4	87.1	19.9	.3	24.4	98.6	34.5
Oklahoma	55.7	27.2	141.1	27.9	0	20.5	57.9	17.5
Oregon	6,013.1	737.1	4,043.5	1,118.2	953.4	1,152.0	1,290.2	996.6
Pennsylvania	425.1	29.1	353.2	132.1	5.4	263.2	462.9	85.5
Puerto Rico	13.5	200.1	35.8	69.0	0	0	0	97.2
South Carolina	178.9	54.7	268.9	76.5	0	68.3	203.3	41.9
South Dakota	148.3	47.3	1,570.0	56.5	18.5	68.5	158.8	63.6
Tennessee	709.5	243.5	507.7	290.3	.5	172.6	244.8	125.5
Texas	426.3	53.1	150.6	150.5	0	870.0	188.0	30.3
Utah	4,277.2	586.5	2,673.4	352.1	901.2	1,101.7	817.0	773.9
Vermont	43.8	12.9	104.6	12.1	309.5	5.1	30.8	14.9
Virginia	711.8	186.6	604.5	169.9	4.8	277.4	638.2	200.1
Washington	3,728.5	364.3	3,146.1	301.5	1,076.1	620.4	853.3	783.0
West Virginia	405.3	42.9	192.9	35.2	2.2	143.3	280.7	67.0
Wisconsin	440.6	29.0	535.3	157.0	21.0	390.3	215.2	33.3
Wyoming	1,435.7	150.3	1,237.8	157.9	317.5	415.0	453.1	326.2
Total	55,454.0 8,198.5		52,728.4	14,073.2	13,900.4	15,603.6	15,244.3	12,571.2

[1] States not listed have no Forest Service recreation program.

[2] One recreation visitor-day (RVD) is the recreation use of National Forest land or water that aggregates 12 visitor-hours. This may entail one person for 12 hours, 12 persons for one hour, or any equivalent combination of individual or group use, either continuous or intermittent.

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State Summary of Total Recreation Use on National Forest System Lands by Activity—Fiscal Year 1981—continued

Horseback riding *	Recreation cabin use *	Nature study *	Sightseeing *	Visitor information service users *	Other developed site use	Total use	State,¹ Territory, or Commonwealth
				1,000 RVDs²			
9.4	0	29.6	17.7	22.9	3.4	1,053.7	Alabama
2.9	101.5	79.7	546.2	97.3	35.0	3,519.6	Alaska
251.7	280.1	545.9	513.6	269.3	725.2	16,376.7	Arizona
30.1	7.6	54.2	25.5	34.4	30.1	2,251.3	Arkansas
585.1	3,205.8	1,120.3	2,015.0	661.0	3,849.4	55,476.3	California
428.6	221.9	490.1	1,212.1	189.1	572.8	20,734.9	Colorado
24.7	132.0	46.3	32.8	33.4	85.9	2,630.0	Florida
29.5	28.5	56.0	117.0	20.0	41.5	2,275.6	Georgia
267.4	255.0	615.0	275.7	134.5	299.1	10,505.9	Idaho
50.3	0	42.1	88.1	11.8	5.6	801.4	Illinois
27.6	0	8.7	1.3	4.8	0	388.7	Indiana
.2	0	.8	0	0	.1	16.5	Kansas
28.3	11.2	51.5	93.9	33.3	23.4	2,090.4	Kentucky
4.9	9.8	17.7	2.9	9.9	17.1	480.2	Louisiana
0	0	2.4	3.3	1.1	6.0	51.6	Maine
22.0	74.9	160.4	84.3	29.8	17.0	4,652.5	Michigan
7.3	204.4	112.5	18.2	37.8	145.8	4,302.5	Minnesota
16.5	0	23.1	7.5	14.8	1.1	1,246.0	Mississippi
27.1	0	78.2	46.2	12.4	19.8	1,706.9	Missouri
391.5	209.2	538.2	330.6	224.3	238.3	9,388.1	Montana

*There is no accurate information concerning what percentage of these activities are motorized and/or occur in a non-wilderness setting. However, it is safe to say that a large percentage of these activities occur via motorization in a developed environment. Federal estimates are near 90%.

Horseback riding *	Recreation cabin use *	Nature study *	Sightseeing *	Visitor information service users *	Other developed site use	Total use	State,¹ Territory, or Commonwealth
5.8	0	13.8	.3	9.4	9.9	129.4	Nebraska
47.1	25.7	105.9	54.8	205.2	150.2	2,059.1	Nevada
.2	0	12.8	243.9	22.5	74.3	2,286.2	New Hampshire
139.5	90.1	458.7	232.1	163.4	170.1	6,416.1	New Mexico
1.2	0	1.6	0	0	0	22.3	New York
47.4	6.7	92.0	273.0	97.0	24.0	4,085.7	North Carolina
3.7	0	3.1	9.2	1.8	0	357.5	North Dakota
14.1	0	17.5	4.2	10.6	2.0	376.3	Ohio
3.5	0	7.8	30.1	9.4	.2	398.8	Oklahoma
245.3	380.8	1,002.3	980.9	406.1	812.0	20,139.5	Oregon
5.3	48.8	51.5	117.1	12.0	9.6	2,000.8	Pennsylvania
0	3.5	12.3	24.8	45.8	28.2	530.2	Puerto Rico
21.7	0	37.9	23.8	18.2	10.0	1,004.1	South Carolina
16.7	80.8	50.3	122.8	88.4	45.6	2,556.1	South Dakota
26.2	39.1	31.4	51.1	25.2	57.8	2,525.2	Tennessee
7.3	0	16.3	36.7	15.4	20.7	1,965.2	Texas
293.8	198.7	345.8	354.0	126.0	751.8	13,621.1	Utah
1.3	.3	5.1	45.6	3.0	20.2	629.2	Vermont
80.2	0	137.9	370.9	36.2	37.9	3,516.4	Virginia
174.9	407.2	448.2	955.6	447.9	679.8	13,986.8	Washington
4.0	.2	25.0	114.0	21.5	36.2	1,370.4	West Virginia
3.6	15.8	66.9	7.6	5.4	7.9	1,928.9	Wisconsin
197.5	180.1	175.5	265.8	60.0	327.4	5,719.8	Wyoming
3,545.4	6,219.7	7,192.3	9,758.2	3,672.3	9,392.4	227,553.9	Total

Most experts agree that 10% of RVD's in Montana occur in Wilderness or Primitive areas. This is much higher than National average but still much less than majority use. This means that 8,449.3 RVD's out of 9,388.1 occur in a developed or motorized environment! This shows me we need more multiple use areas not less!

63A

VALLEY VIEW TRAILER PARK & GROCERY STORE
At Henry's Lake
14 MILES FROM YELLOWSTONE PARK

Owners
[redacted] Sally Khatchatourian

June 8, 1987
Monday

This letter is the opinion of the Island Park Forest Round Table Committee and the Island Park Sportsman Association.

We believe Alternative 3, leaving the area proposed for ~~action~~ wilderness - the way it is - to be the best action. In this proposed Wilderness area, there are NO endangered species and the area is only "unique" . . . in that it is an attraction.

Idaho MUST realize the financial resource she has in tourism through showing her vast beauty. Management and protection are necessary to the preservation of Idaho's grand country BUT it is the priorities of that management that make the heartbeat of a financially successful state.

We believe "Strongly" in Alternative 3 — allowing it to remain vehicle accessible — this allows ALL people to feel this high country . . . our handicapped and our elderly. Our country is for every one! The Federal Government should NEVER be allowed to close the door.

Sincerely,
Tara Khatchatourian

Star Route Box 26 • Macks Inn, ID 83433 • (208) 558-7443

64A

F. H. STOLTZE LAND & LUMBER CO.
Lumber Manufacturers
Box 389 DILLON, MONTANA 59725

June 19, 1987

BLM Office
Dillon, Montana 59725

Dear Sir:

Please accept my comments concerning the proposed Centennial Mountain's Wilderness as outlined in the draft proposal of February, 1987.

I am opposed to any wilderness in the Centennial Mountains. I am also opposed to any more wilderness in the state of Montana.

The Centennial proposal is too narrow and irregular to be managable as wilderness. It also does not meet the intent of wilderness as proposed in the original law because of its narrowness and small size. It contains no unique features that would justify a wilderness of smaller size.

M-25

The D.E.I.S. underestimated the value of timber in the area, particularly the fact that other sources of timber for the Dillon sawmill have decreased to the point that the allowable cut from this area could make the difference in the mill running or shuting down.

Cost of wilderness management and fire control were not analysed. The large fires in the Sleeping Giant area near Helena caused the Forest Service to spend $500,000. to reclaim creek channels. This does not include the cost of grass seeding and other reclaimation. Those long term costs were not included or analysed in the D.E.I.S.

G-1

Elk management can improve with logging. The D.E.I.S. does not state this fact but rather the opposite which is a falsehood. Hunter success and hunter opportunity can be improved but it would take road and access management and control. Logging does not harm elk but too many open roads do. The D.E.I.S. incorrectly states the facts and presents an incorrect analysis of the situation. The BLM needs to correct their analysis to include logging impacts if roads are left open as well as logging impacts if all roads are closed or blocked after logging. Also season restrictions on logging can greatly reduce the impacts on elk.

O-16 O-7

I am concerned by the small size of this wilderness from another angle, in that I wonder what lands will be added on at a later date. I suspect there will be pressure to add the adjacent State lands and the Sheep Experiment Lands to the area if it is made wilderness. If that is a goal of the BLM it should be so stated in the D.E.I.S. If it is not a goal it should also be so stated. I think this issue should be discussed in the D.E.I.S. as it is important to the final decision, yet it was ignored. If additional lands could be made wilderness later then those impacts should at least be mentioned in your study.

64B

M-25

In summary the timber from this area is critical to the survival of the sawmill in Dillon. This mill accounts for 1/3 of the Dillon economy in my estimation. But even if the area had no timber I feel it is too small and irregular to be proper wilderness according to the Wilderness Act. If tackons will make it a more useable wilderness then these tackons should be discussed and analysed in the original D.E.I.S. so the public is properly informed of the BLM intent and the consequences of this action.

Thank you for your consideration.

Sincerely,

Michael J Lynghol

Michael J. Lynholm
Resident Manager

65A

F. H. STOLTZE LAND & LUMBER CO.

Lumber Manufacturers

Box 389 DILLON, MONTANA 59725

June 17, 1987

Bureau of Land Management
Butte District Office
District Manager
P. O. Box 3388
Butte, Montana 59702

Subject: Centennial Mountains Wilderness Study/EIS

Dear Sir:

Please enter these comments into your record for the Centennial Mountains Wilderness Study/Environmental Impact Statement.

1) We cannot go along with any of the alternatives proposed in the EIS. Alternative 1 (the proposed action) is biased against any development as are all of the other alternatives.

G-1 2) We feel that the EIS is biased against logging due to the statements about the modification of elk habitat which will result from logging. It should be remembered that the Montana Elk-Logging Study, which was 15 years in the making, is still just a guideline. There is nothing in the study which says that logging leads to a reduction in hunting or elk populations. My 20 years of working in the woods has repeatedly shown me and any other component biologist that wildlife finds security around logging activity during hunting season. The logging activities have not harmed elk populations during the rest of the year other than through momentary displacement. Let the first rifle shot be fired and the elk will go where they feel it is safe - adjacent to a logging operation.

F-2 3) There is mention made that most of the area is in Situation 2, grizlly bear habitat. Several times in the EIS it states that conflicts between human activity and grizzly bears will remain low if certain portions of this study area become wilderness. This statement is pure bull! I have lived in the middle of grizzly bear habitat in Northwest Montana for 30 years and I am here to tell you that conflict will occur no matter how an area is managed. If the grizzly bear is left undisturbed they will expand their range over time and conflict will occur with cattle ranchers, sheep ranchers, and with recreationists. It was brought up at the public hearing in Dillon on June 3, 1987 that the whole Centennial Mountain Range was critical for bear and wolf movement between Ecosystems in Yellowstone and the Salmon Breaks area. It should be noted that in Doctor Charles Jonkel's studies of the grizzly bear in the North Continenal Divide

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65B

Page 2

F-2 cont. Ecosystem that "the bear only needs a fence line and a coulple of rose bushes for security cover and a corridor. One final note - the term "critical habitat" was thrown around several times at the hearing. It should be remembered that for any habitat to be classified as "critical habitat" requires a seperate EIS under the Endangered Species Act.

O-7 4) We feel there should be no wilderness designation for this area and that the "primitive" classification is totally justified. In order to better manage this as a "primitive" area I feel the BLM should seek a land trade with the State of Montana. We feel the State of Montana should trade for timber lands on the west end of the Centennials in the Price Creek Area. This would consolidate land holdings for both parties and still keep the west end in the timber base. The lands which the state receives should be of like value. You need to not only look at the similar timber and land values, but also look at the similar land forms and slopes. The reason we say this is because we need to remember that state lands are School Trust Lands and are for generating dollars for the school systems. Lands which are dis-similar in the values stated above are not in the best interest of the schools. We feel that if there is a disparity towards the state where a land exchange is proposed, as a taxpayer, we would seek a court injunction to stop the trade until such time as a workable solution could be reached.

Sincerely,

Floyd W. McCubbins
Stoltze Land & Lumber

FWM/jo

cc: Mr. Gary Williams
Dept. of State Lands
Helena, MT 59601

66A

William R. Meiners
Conservationist

June 11, 1987

James Moorhouse
District Manager, Butte District
Bureau of Land Management
Box 3388
Butte, Montana 59702-3388

Re: Centennial Mountains Wilderness Study/Environmental Impact Statement - Draft, February 1987

Dear Mr. Moorhouse:

In my opinion, you - the Bureau of Land Management (BLM) and Forest Service (FS) - have erred in judgment and selection of an alternative that would assure management of the Centennial Mountains in the public's interest.

O-16 Alternative 1 (the proposed action) is certainly not such a management scenario. Alternative 2 would be much better, but the entire acreage of 72,885 plus that acreage (some 17,000 acres) embraced within the Dubois Sheep Experimental Range begs your consideration for protection of the entire area to sustain its watershed, F-1 fisheries, wildlife, recreational, scenic and other public values. The several endangered species dependent upon this entire area as an integral part of their special habitat requirements commands special attention, on its own merit and as it contributes to and/or extends the ecological relationship of the Greater Yellowstone Ecosystem.

I could go on at length regarding the inadequacies of the draft environmental impact statement (DEIS). Alternative 2, as has been noted, is certainly the best alternative presented, but it would seem a management scenario of wilderness designation, area of critical environmental concern (ACEC) to address the very significant fish and wildlife resource habitat requirements and, perhaps, critical watershed/water quality requirements would be an appropriate management scenario for the Centennial Mountains inclusive of the Dubois Sheep Experimental Range.

Thank you for this opportunity to comment. And, please do finalize a management scenario for the public's interest, now and tomorrow - not a scenario dictated by short-sighted private interests.

Sincerely,

William R. Meiners
William R. Meiners

Resource Planning and Management Associates, Inc. • 885 South Locust Grove Road • Meridian, Idaho 83642 • Phone (208)888-1254

67A

UTAH GEOGRAPHIC SERIES

UTAH GEOGRAPHIC SERIES
P.O. Box 8325 • Salt Lake City, Utah 84108 • (801) 583-2333

6/16

Dear Jim -

Just a quick note about the Centennial Mtns. I am intimately familiar with that magnificent area and its importance to the environmental integrity. As a former resident of Montana (15 years) and past-president of the Greater Yellowstone Coalition, I would like to lend my voice in support of the proposed 92,000 acre Centennial Mtns Wilderness. The so-called conservationists Ecosystem Alternative is a reasonable proposal and will protect the magnificent resource in the Centennials.

Sincerely. Rick Reese
Publisher

68A

MONTANA POWER COMPANY mpc GENERAL OFFICES: 40 EAST BROADWAY, BUTTE, MONTANA 59701 • TELEPHONE (406) 723-5421

June 8, 1987

Mr. Darrell McDaniel
Recreation Planner
Butte District Office
Bureau of Land Management
P. O. Box 3388
Butte, MT 59702

Dear Mr. McDaniel:

Thank you for the opportunity to comment on the Centennial Mountains Wilderness Draft Environmental Impact Statement (EIS). The Montana Power Company would like to make the following comments.

O-15 The Montana Power Company provides electrical service to much of southwestern Montana via a number of transmission lines; hence, we must be assured access to all existing and potential future customers throughout the area. The Montana Power Company urges you to include a provision in the final EIS for any existing and future utility and transportation corridors that may be necessary when the area's mineral resources become actively sought after and extracted. By addressing this issue now, many unnecessary complications can be avoided in the future when time may be of the essence.

The Montana Power Company appreciates this opportunity to comment.

Sincerely,

D. M. Sprague, Manager
Environmental Department

DMS/lh

181034

75th ANNIVERSARY 1912 1987

69A

THOMPSON ENGINEERING INC
CONSULTING ENGINEERS
215 Farnsworth Way 8x 55
Rigby, Idaho 83442
745-8771

June 11, 1987

District Manager, Butte District Office of the BLM
P.O. Box 3388
Butte, Montana 59702

RE: Centennial Mountains Wilderness Study/EIS

Dear Sir,

I have reviewed the draft EIS and concur with the selected alternative 1 as being the most acceptable alternative for wilderness designation. Alternate 3 (no wilderness) is my choice above all other alternatives for the Jefferson Mountain area. The Jefferson Mountain area is rugged and almost inaccessible as it is without making it a wilderness area.

I have been familiar with the Willow Creek /Upper Hell Roaring Creek area since 1953. I have prospected on Mount Jefferson and filed claims on Decorative Building Stone on the Continental Divide near the head of Tin Cup.

Several mine shafts and diggings are evident west of Mount Jefferson approximately two miles northeasterly from the the end of the mining road on the Tin Cup Mining claims. One shaft is at least 75 feet horizontally into the mountain and several are vertical shafts.

Three old log mining shacks are located in this area along with

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remains of a sluice box where miners processed the materials for gold.

Evidence of the previous mining activities leads me to believe that gold was located and mined from this area in the past and if gold prices moved higher it may be feasible to open these mines again. Roads would be prohibitive because of the terrain and natural beauty of the area and other alternatives to removing any minerals would have to be developed.

The Forest Service installed gates on the Idaho side and basically closed the roads leading to the divide several years ago. This policy has provided protection for the wildlife and environment in general and should be considered as an acceptable alternative to a wilderness designation.

Sincerely,

Lyle I Thompson

LYLE I THOMPSON PE
THOMPSON ENGINEERING INC.

LIT/pcat

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6/2/87

Dear Sirs:

K-1 Please give further consideration to the fact that the Idaho side of the Centennial, will be timbered starting in 1991 and the entire region is critical to the Greater Yellowstone Ecosystem. Please enlarge your recommendation from 24,000 acres to the 92,000 acres proposed by conservationists

TETON RANCH

71A

May 30, 1987

District Manager
Bureau of Land Management
P.O. Box 3388
Butte, Montana 59702

Dear Sir:

Please consider this letter as the official comment of the Montana Audubon Council on the Centennial Mountains Wilderness Study/Environmental Impact Study.

We believe this EIS is clear and very well written. We commend you for the cooperation apparent between BLM and FS in its preparation.

O-16 We are not pleased with the Proposed Action. We also are convinced that, despite statements made on page 25, the lands included in the USDA's Sheep Experiment Station must be included in the study and be designated wilderness, or at least managed as wilderness with minimal grazing impacts on the environment.

The mid- and longterm future of Montana lies in the broad area of recreation. Already pushing other industries for first place, recreation will become Montana's leading industry as human populations continue to climb and as quality environments elsewhere deteriorate. However, this bright future for Montana will only happen if we carefully protect our peerless natural resources.

F-2
G-1 The Centennial wilderness, if properly designated, accomplishes two extremely important goals. It will safeguard the wilderness itself and provide essential habitat for wildlife, especially elk and grizzly bear. Equally important, it will protect the watershed for the Red Rock Lakes National Wildlife Refuge and Lima Reservoir, both critical areas for trumpeter swans and other wildlife.

The area finally submitted for wilderness, therefore, needs to include all of the acreage within the study area and it must include the Sheep Experimental Station. Therefore, the Montana

71B

Bureau of Land Management
Page 2

Audubon Council urges you to select Alternative 2 with the addition of the Sheep Experimental Station as your recommendation to Congress for inclusion in the wilderness preservation system.

Thank you for this opportunity to comment.

Sincerely,

Robert M. Ballou
President

cc: Senator Max Baucus
Senator John Melcher
Congressman Pat Williams

72A

HEADWATERS PADDLING ASSOCIATION
P.O. BOX 1392 • BOZEMAN, MT 59715

JUN 1 2 87

June 11, 1987

District Manager
Butte District Office of the BLM
P.O. Box 3388
Butte, MT. 59702

Dear Sir;

The HEADWATERS PADDLING ASSOCIATION takes the following position concerning the Centennial Mountains Wilderness Study/Environmental Impact Statement.

We find the proposed alternative (Alternative 1), in total, to be an acceptable balanced plan. The proposed alternative would satisfactorily maintain water quality in the Red Rock Wildlife Refuge and downstream areas.

We would like to see the wilderness area extended on its southern boundary to include a strip of approximately one-half mile wide paralleling the continental divide/Montana Idaho border and the full length of the wilderness area. This would allow for protection of the extreme alpine areas, although presenting a problem with a defined boundary. That suggestion notwithstanding, the HEADWATERS PADDLING ASSOCIATION supports Alternative 1.

O-16 What we do have a problem with accepting is the apparent political football which has been made of the Science and Education Administration, U.S. Sheep Experiment Station lands. As stated in the BLM Management Framework Plan, land abuse is occurring within the sheep station lands from ORV's. We find this very objectionable that politics is allowing abusive land practices to occur. We therefore feel that a continuing effort be extended to bring these lands into compliance with acceptable land use practices and eventually including that portion of the sheep station in the wilderness area. Continued land abuse of the sheep station lands can only create water quality problems within Red Rocks Wildlife Refuge and downstream areas. Your continuing efforts to resolve these problems will be of great importance.

The HEADWATERS PADDLING ASSOCIATION is a recently organized group of 70 plus members. We are concerned with water access and water quality issues in Montana.

Sincerely,

Craig Barnes
Issue Committee

73A

Island Park
Island Park Area Chamber of Commerce
P.O. Box 83, Island Park, Idaho 83429

June 17, 1987

District Manager
Butte District Office
Bureau of Land Management
P.O. Box 3388
Butte, MT 59702

Dear Sir:

The Island Park Area Chamber of Commerce wishes to comment on the Centennial Mountains Wilderness Study - EIS as a community of 25 businesses directly or indirectly affected by this proposal. The proposed action as presented does not completely satisfy our desires for this magnificent area for the following reasons:

1. The proposed closure of the Odell Creek snowmobile access is not justified in the document, nor are additional snowmobile closures proposed in other alternatives. The legitimate concern for erosion and wildlife impacts caused by roads and ORV use cannot be extended to snowmobile winter activity. The proposed wilderness has merit outside of this arbitrary snowmobile closure, which we understand comes along with wilderness designation. However, if the Odell Creek access corridor was granted an exemption for winter use only, then our objection to wilderness designation would be resolved.

2. As businesses dependent on outdoor recreation and tourist attractions, we very much support efforts to preserve the Tri-state population of trumpeter swans. The proposed action, while protecting Refuge waters from watershed disturbance, does little for the wetlands downstream from the Refuge which have become increasingly important for nesting birds. If wilderness designation is geared at protecting water quality for the swans in the Centennial Valley, then wilderness should be seriously considered for lands further down the valley with erosive slopes.

Thank you for considering our comments in your decisionmaking process.

Sincerely,

Elaine Burns

Elaine Burns,
President

74A

BLUE RIBBON COALITION INC.
P.O. Box 5449, Pocatello, Idaho 83202 (208) 237-3460

May 21, 1987
James Moorhouse, Butte District Manager, BLM
Box 3388
Butte, Montana 59702-3388

Dear Mr. Moorhouse:

We support your decision not to recommend the Centennial Mountains for wilderness designation. You will probably get a lot of "I want" letters from the wilderness advocates, but there is no justification for further restrictions in this area.

E-1 F-2 Aside from the fact that the commercial public land uses are in many instances beneficial to wildlife habitat, many recreational users would be denied access by wilderness designation. The old recreation versus industry argument for wilderness just doesn't apply, as most recreational uses are also excluded under that designation. In fact the trail bike restrictions to protect grizzly bear habitat in the area aren't based on any factual data and may be challanged. Many bears have had to be destroyed due to encounters with backpackers. There has not been, to my knowledge, a single bear-trailbike encounter that resulted in the bear having to be destroyed. Any future restrictions to protect grizzly bears should apply only to hikers, and trailbikes should be allowed as the bears can hear them coming and avoid an encounter.

Reasons not to consider wilderness designation for this area are.
#1 Existing roads in the area that are popular for recreational access.
#2 Popular snowmobile recreation area that is important to the tourism economy..
#3 No major management changes are proposed that would significantly alter the areas wildlife habitat or recreational value.

Again I would like to stress that you should make your decision based on hard evidence and sound multiple use management practices instead of pressure from unreasonable special interests groups.

Sincerely,

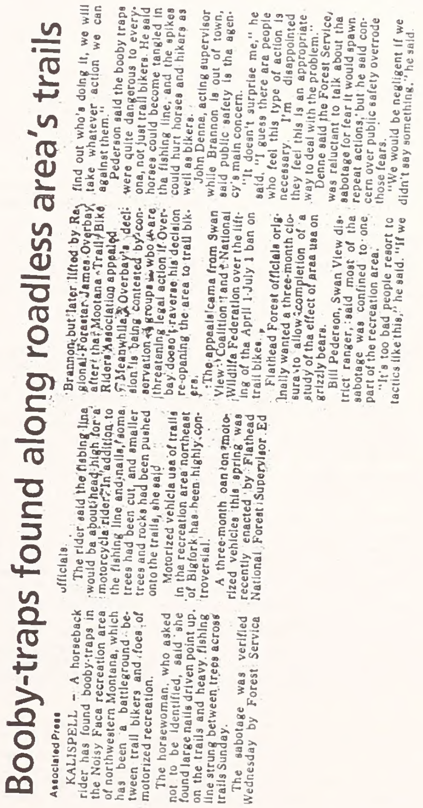
Clark L Collins

Clark L. Collins, Executive Director.

cc: Senator John Melcher
Senator Max Baucus
Representative Ron Marlenee
Representative Pat Williams

"Preserving our natural resources for the public instead of from the public."

74B



Booby-traps found along roadless area's trails

Associated Press

KALISPELL — A horseback rider has found booby-traps in the Noisy Face recreation area of northwestern Montana, which has been a battleground between trail bikers and foes of motorized recreation.

The horsewoman, who asked not to be identified, said she found large nails driven point up on the trails and heavy fishing line strung between trees across trails Sunday.

The sabotage was verified Wednesday by Forest Service officials.

The rider said the fishing line would be about head high for a motorcycle rider. In addition to the fishing line and nails, some trees had been cut, and smaller trees and rocks had been pushed onto the trails, she said

Motorized vehicle use of trails in the recreation area northeast of Bigfork has been highly controversial.

A three-month ban on motorized vehicles this spring was recently enacted by Flathead National Forest Supervisor Ed Brannon, but later lifted by Regional Forester James Overbay after the Montana Trail Bike Riders Association appealed.

Meanwhile, Overbay's decision is being contested by conservation groups who are threatening legal action if Overbay doesn't reverse his decision re-opening the area to trail bikers.

The appeals came from Swan View Coalition and National Wildlife Federation over the lifting of the April 1-July 1 ban on trail bikes.

Flathead Forest officials originally wanted a three-month closure to allow completion of a study of the effect of area use on grizzly bears.

Bill Pederson, Swan View district ranger, said most of the sabotage was confined to one part of the recreation area.

"It's too bad people resort to tactics like this," he said. "If we find out who's doing it, we will take whatever action we can against them."

Pederson said the booby traps were quite dangerous to everyone, not just trail bikers. He said horses could become tangled in the fishing line, and the spikes could hurt horses and hikers as well as bikers.

John Denne, acting supervisor while Brannon is out of town, said public safety is the agency's main concern.

"It doesn't surprise me," he said. "I guess there are people who feel this type of action is necessary. I'm disappointed they feel this is an appropriate way to deal with the problem."

Denne said the Forest Service was reluctant to talk about the sabotage for fear it would spawn repeat actions, but he said concern over public safety overrode those fears.

"We would be negligent if we didn't say something," he said.

75A

Jim Dayton
9490 Cross
Msla, Mt.
59802

The board of directors of the Five Valleys Audubon Society strongly supports alternative 2 for all wilderness in the wilderness study. We feel that this alternative is the only alternative that approaches even adequate protection of the historical Centennial Valley for its its diverse values. The future of the Red Rocks Wildlife Refuge, we feel, depends upon total protection of the area from any more development. The unstable soils would be a problem leading to siltation of the refuge. We feel that protection of the scenic & wildlife & diverse recreational values can only happen w/ a designation of complete wilderness for the area.

Sincerely,
Jim Dayton for
Board of Directors
Five Valleys Audubon Society
Missoula, Mt.

76A

Fugowee
Snowmobile Club
P.O. Box 106
Island Park, Idaho 83429

May 28, 1987

Darrell McDaniel
Butte District Office
Bureau of Land Management
P.O. Box 3388
Butte, MT 59702

Dear Mr. McDaniel,

In regards to the Environmental Impact Statement. The Fugowee Snowmobile Club supports the Alternative Action Number One.

We take exception to the closure of O'dell Creek haul road to snowmobilers. We suggest a corridor remain open to provide access to Lakeview from Yale Kilgore area. We would welcome further discussion.

Sincerely,

Glen English
Glen English
President
Fugowee Snowmobile Club
P.O. Box 106
Island Park, ID 83429

GE/lc

77A

NATIONAL WILDLIFE FEDERATION
Northern Rockies Natural Resource Center
240 N. Higgins, Missoula, Montana 59801
(406) 721-6705

June 19, 1987

Project Manager
Centennial Mountains Wilderness Study/EIS
Butte District Office
Bureau of Land Management
P.O. Box 3388
Butte, MT 59702

Dear Sir:

The following comments are submitted on behalf of the National Wildlife Federation and the Idaho Wildlife Federation. NWF is one of the nation's oldest and largest conservation organizations, with over four million members. The Idaho Wildlife Federation represents hunters, fishermen and conservationists from across Idaho, many of whom regularly use and enjoy the public lands being considered for wilderness designation in the Centennial Mountains DEIS. IWF is an affiliate of the National Wildlife Federation. Please make these comments a part of the official record.

The Centennial Mountains and the Centennial Valley to the north comprise a unique and spectacular area of the American West. From the time one turns off I-15 in the west or crosses Red Rock Pass in the east, a sense of remoteness and wilderness almost assaults the visitor to the Centennials. The east west configuration of the mountains and valley, the shimmering expanse of the Red Rock Lakes marshes, and the diversity and abundance of wildlife from the peaks to the valley floor demand the best in professional resource planning and the highest measure of resource protection.

Because of the great wildlife resources found in the Centennials and the wild country that provides vital habitat, the Idaho and National Wildlife Federations strongly endorse the adoption of Alternative 2, which is the maximum wilderness alternative. Under this Alternative, 72,885 acres would be recommended to Congress for inclusion in the National Wilderness System. The Federations, however, believe that no Centennials Wilderness can be complete without the inclusion of certain lands presently managed by the Agricultural Research Service, U.S.D.A (ARS). Both the law and the basic tenets of professional land management require preparation of a supplemental EIS which considers inclusion of the ARS sheep station lands in the Centennial Mountains Wilderness.

O-10 The Federations also believe that a supplemental EIS must address another important shortcoming in the Draft Centennial EIS. While Alternative 1, with 26,218 acres recommended for wilderness, is identified as the proposed agency action in the Centennials, absolutely no explanation is offered as to why this choice was made. Indeed, a review of the DEIS leaves one with

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Centennial Mountains Wilderness EIS
June 19, 1987
Page 2

O-10 cont. the feeling that the agencies simply threw darts to see which alternative would be chosen. No reasons are set forth to support the choice of Alternative 1, nor is any justification provided as to why other alternatives were rejected. In order for NWF, IWF or any other reviewer to adequately comment on the DEIS and proposed alternative, insight must be provided as to what factors the agencies relied on to make their choice.

In addition, one aspect of the recommended alternative which must be separately justified and explained is the failure to propose any lands for wilderness designation in Idaho. It is indeed curious that while the BLM and the Beaverhead National Forest found most of the lands under their jurisdiction fully deserving of wilderness protection, the Targhee National Forest found that none of the land under its management warranted wilderness designation. Certainly the quality of the land itself or the resources found there cannot provide any basis for this stark difference in agency direction. Absent a full and rational explanation of this situation, the agency's recommendations can only be regarded as arbitrary and against the law.

O-16 As noted, a major failing of the DEIS is the absence of an alternative that includes the sheep station lands located in Montana as a wilderness alternative. The key to a successful impact statement is an adequate discussion of alternatives. Not only must Congress, as the decision-maker, and the public be informed through the DEIS of any alternative that may lessen environmental degradation, but the DEIS must completely and thoroughly discuss the consequences of both the proposed action and all reasonable alternatives under the standard of environmental full disclosure. See, e.g., Iowa Citizens for Environmental Quality, Inc. v. Volpe, 487 F.2d 849, 851 (8th Cir. 1973). To meet this standard the DEIS must raise the issues clearly and concisely. See 40 C.F.R. 1501.2 (1986). Such a "detailed statement helps insure the integrity of the process of decision by precluding stubborn problems or serious criticism from being swept under the rug." Silva v. Lynn, 482 F.2d 1282, 1285 (1st Cir. 1973).

Prior to 1981, the sheep research station in the Centennials was jointly managed by the Bureau of Land Management, the Targhee National Forest and the ARS. In 1981, Congress placed in the Secretary of Agriculture exclusive jurisdiction of those sheep station lands in Montana. 95 Stat. 1328 (1981). The Secretary chose to continue management of the lands through the ARS. While both the Forest Service and the Bureau of Land Management are directed by statute to examine lands under their jurisdiction for wilderness classification, the ARS is not. For this reason, the DEIS does not develop an alternative which considers Montana

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O-16 cont. sheep station lands for wilderness designation, while Idaho sheep station lands are considered in two alternatives. Draft EIS, pp. 12, 24, 25. This failure violates NEPA.

Even a statutory barrier to an alternative does "not automatically render discussion of that alternative unnecessary." Kilroy v. Ruckelshaus, 738 F.2d 1448, 1454 (9th Cir. 1984). Further, "(i)n some cases an alternative may be reasonable, and therefore required by NEPA to be discussed in the EIS, even though it requires legislative action to put it into effect." Id. Contrary to the holding in Kilroy and many other cases, the present DEIS automatically precludes discussion of a vital alternative: wilderness designation on the sheep station summer range. Moreover, the agencies' error is arbitrary and capricious because Congress did not prohibit wilderness consideration for sheep station lands at 95 Stat. 1328 (1981). Congress merely established sole jurisdiction in the Secretary of Agriculture in legislation that in no way precluded full NEPA review. See Kilroy, 738 F.2d at 1454.

While the Departments of Interior and Agriculture violated NEPA by failing to develop an alternative which considers Montana sheep station lands for inclusion in the National Wilderness System, it is also our position that the Secretary of Agriculture's decision to continue management under the ARS in 1981 should have triggered NEPA review if the decision had the effect of precluding wilderness review. As noted, had the Secretary placed management authority under the Forest Service, as is the case with the sheep station lands in Idaho, the lands would have been considered for wilderness designation because the Wilderness Act directs the Forest Service so to review all lands under its jurisdiction. The Secretary's decision to vest management authority in the ARS effectively circumvented this statutory directive and thus was a major federal action within the meaning of NEPA. Compare Parker v. United States, 448 F.2d 793 (10th Cir. 1971), cert. denied, 405 U.S. 989 (1972) with California v. Block, 690 F.2d 753 (9th Cir. 1982).

The Secretary, moreover, failed to justify his decision to continue sheep station management under the ARS, which raises additional legal questions. First, the Administrative Procedures Act requires that the Secretary's actions not be "arbitrary, capricious, or an abuse of discretion." 5 U.S.C. 706 (2)(A). The reviewing court is entitled to review the record of reasons for the Secretary's decision. The record of reasons "promotes thought by the Secretary and compels him to cover the relevant points and eschew irrelevancies, and . . . the need to assure careful administrative consideration 'would be relevant even if the Secretary's decision were unreviewable.'" Dunlop v.

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O-16 cont. Bachowski, 421 U.S. 560, 572 (1975) (quoting Bachowski v. Brennan, 502 F.2d 79, 88 n.14 (3rd Cir. 1974)). Therefore, where the Secretary created no record, either as to allowing wilderness study of sheep station lands in Idaho or as to denying wilderness study of sheep station lands in Montana, he abused his discretion.

Second, the ARS sheep station lands in Idaho remain under the jurisdiction of the Forest Service. There is no indication that the ARS is a land management agency. The Secretary's passive decision to remove the sheep station summer range from public land is a major federal action requiring preparation of an EIS because the original Executive Orders withdrawing the lands did not remove them from their principal stewards. By example, the Forest Service still holds the sheep station lands in Idaho, despite the ARS's tenancy. Elsewhere, where the ARS has sole management, the statutory directive clearly establishes Congressional intent that the land be devoted exclusively to experimentation, such as Ft. Keogh, at 43 Stat. 99 (1924). Here, at 95 Stat. 1329 (1981), Congress did not indicate an exclusive function, did not remove the sheep station from public lands, and did not preclude wilderness study.

Third, sheep station lands in Idaho are considered and offered for wilderness designation in Alternatives 2 and 8. Since sheep station lands in Idaho are considered, it is inconsistent not to consider sheep station lands in Montana. In the supplemental draft EIS, please display a map showing lands used by the sheep station in Idaho that are within the WSA. The Secretaries of Interior and Agriculture should maintain the wilderness quality of all sheep station lands within the exterior boundaries of the WSA while the status of these lands is unsettled.

For the above reasons, sheep station lands in Montana must be considered and presented in a wilderness alternative consistent with reasonable resource and boundary management. Wilderness designation should not impede or discourage established activities and goals within the sheep station's Montana summer range. At a minimum, wilderness designation would allow establishment of a more manageable and appropriate southern wilderness boundary and would protect the sheep station's resource base. Such an alternative must be developed and presented in a supplemental draft so that both Congress and the public may fully understand the choices involved in Centennial Mountain wilderness protection.[1]

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[1] Consideration of an Wilderness alternative which includes all sheep station lands may be developed without further investigation or expense, if necessary, consistent with congressional spending directives such as H.R. 7724 at 94 Stat. 2959 (1980).

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In addition to these major inadequacies in the draft EIS, we have the following concerns:

O-10 cont. 1) In the context of the sheep station, what management problems are foreseen for the southern wilderness boundary under Alternative 1? How could these problems be resolved administratively? Could Congress resolve these problems by designating a portion of the adjacent sheep station summer range as wilderness? Please explain.

O-16 cont. 2) Explain and project the present and future "need" for dedication of public lands to a sheep station. Contrast this need with other uses of the lands now occupied by the sheep station. This discussion is required because "(t)he Secretary shall allow . . . opportunity to comment upon and participate in the formulation of plans and programs relating to the management of the public lands." 43 U.S.C. 1712(f) (1982). To comment intelligently, the public must understand future management plans for the sheep station.

F-3 3) Other than mentioning that the "ecosystems which make up the Centennials are represented elsewhere in the Yellowstone area," the DEIS fails to explain the relationship of the Centennials to the Yellowstone ecological complex. DEIS at 42. Is there any relationship? Please explain, especially as to the grizzly.

O-7 4) Present and discuss an Alternative which exchanges BLM lands outside the study area for state lands within and adjacent to the study area, especially the lands west of Matsingale Creek. Such an Alternative is critical because it allows a connecting-up of the segmented wilderness proposal in Alternative 1. Apparently the State of Montana is willing to consider such exchanges. DEIS at 40.

Rather than prepare a separate EIS on the proposed exchanges, the BLM may include them in the present DEIS by discussing the exchanges in a supplemental draft EIS. If the BLM proceeds to prepare a separate EIS on the exchanges, it is difficult to imagine how an issue so critical as the connecting of the two proposed wilderness areas should not be addressed in that EIS.

O-10 cont. 5) Where an adjacent private landowner objects to wilderness, discuss the potential for a land exchange to relocate such owners to a nonwilderness setting.

B-2 6) To what extent does existing snowmobile use constitute a trespass on the wilderness study area, on the primitive area, and

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B-2 cont. on private lands like the Taft Ranch? How long have such trespasses occurred? How many citations have been issued? What other measures does BLM take to discourage these and the Price Peet - Blue Creek motor vehicle trespasses?

O-10 cont. 7) On a map, indicate the size and proximity of the designated wilderness lands managed by the Fish and Wildlife Service. Are there any nonwilderness lands managed by FWS that are contiguous to the Centennials WSA? If so, explain why they are not recommended for wilderness here and include them as recommended lands where suitable in the supplemental EIS requested above.

8) What was FWS's recommendation on potential development of BLM lands that would increase sedimentation in the refuge watershed? Why should any increase in sedimentation be tolerated?

F-8 9) On a map, identify any Situation 1 and Situation 2 grizzly habitat in the WSA. If any such area is not recommended as wilderness, explain why any development should be allowed. Include such lands in the supplemental EIS.

M-23 10) In Alternative 2 -- 100% wilderness -- livestock grazing continues at present levels. It is not clear whether this means no livestock-related jobs will be lost. Please clarify, remembering that permittees may be allowed vehicle use where necessary in wilderness.

O-10 cont. 11) In Alternative 1, several WSA parcels in Montana are not recommended for wilderness, but they would be if Alternative 6 were chosen. Explain with particularity why these areas are omitted in Alternative 1.

12) Which alternative would maximize recovery of endangered and threatened species? Does the Endangered Species Act require the adoption of that alternative?

L-4 13) Identify each grazing permittee, the size of each allotment, the number of AUMs on each, the range condition, the riparian condition, and the trends. On a map, indicate the location of each allotment. For each allotment, identify the ratio of AUMs allotted to livestock and to wildlife.

A-3 14) Explain how each planning criterion and quality standard was applied to determine the various alternatives. This is necessary because it is not clear why Alternatives 1 and 4 through 8 exist in their present form. Was there some support for each of the 8 alternatives? Please explain.

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O-10 cont.

15) Why do you presume it would be illegal to use a motor vehicle to transplant a mountain goat when motor vehicles may be used for other administrative purposes and by grazing permittees when necessary?

L-5

16) Why do you propose to prohibit motor vehicle use in building the 1/2-mile Price Peet fence? Why do you propose to build the Price Peet fence?

J-6

17) What are the sources of the excess sediments, nitrogen, phosphorous, and coliform mentioned on page 33? What steps are being taken to correct each problem?

18) The DEIS indicates that "(s)everal sheep grazing areas were removed from allotment." DEIS at 34. What would be the economic effects of providing financial assistance for cancellation of allotments -- in whole or in part -- under 43 U.S.C. 1752(g) (1982)?

D-2

19) Cite the congressional authority for the Continental Divide Scenic Trail. Show the proposed location on a map. To stay on the Continental Divide, the trail must cross the sheep station. What potential conflicts arise and are they manageable?

O-10 cont.

20) Is the SCS snow course indicated on any map in the DEIS? If not, please so indicate. Explain the activities involved.

21) Of the 46,637 acres not recommended for wilderness in (preferred) Alternative 1, only 4,010 acres are expected to suffer development (DEIS at 51), and only 5,675 acres are appropriate for snowmobiles (Id.). Identify these lands and the remaining 37,000 acres on a map. Explain why none of the remaining 37,000 acres was recommended for wilderness. Of those 37,000 acres, identify the lands suitable for wilderness designation and include them in the Alternative responsive to Point One above.

J-1

22) Explain the difference between the 16,811 acres of unstable soil to be disturbed by development and the 11,297 acres of unstable soil to be disturbed by oil, gas, or logging. DEIS at 53. Estimate the public cost of remedial soil stabilization projects to achieve the intent of "Best Management Practices" to protect water quality and Lima Reservoir. Show all unstable soils on a map.

O-10 cont.

23) The DEIS contradicts itself: "Wilderness designation would adversely affect black bear, mule deer, moose, and blue grouse by prohibiting logging." DEIS at 56 (successional vegetation). "Wilderness policy and existing fire management

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O-10 cont.

plans may result in more timber burned and vigorous forage production." DEIS at 53 (good for the soil at the fire temperatures associated with regular natural burns). A similar contradiction occurs as to livestock forage on p. 57.

H-6

24) When and how will the determination be made whether mountain goats are exotic?

O-10 cont.

25) What is the status of the trespass and erosion problems outlined in Appendix D, p. 108? What enforcement measures are being or will be taken?

A-4

26) In regard to the failure to recommend any Idaho lands for Wilderness, independently explore and explain the wilderness qualities, or lack thereof, of the following areas: (1) west of Scalp Creek; (2) between Scalp Creek and Tin Cup Road; and (3) east of Tin Cup Road.

Thank you for this opportunity to participate.

Sincerely,

Edward M. Dobson, Legal Intern

Thomas France, Esq.

Montana congressional delegation
Idaho congressional delegation

78A

American Wilderness Alliance
~~7600 East Arapahoe Road / Suite 114 / Englewood, Colorado 80112 / (303) 771-0380~~

Box 1772
Boise, Idaho 83701

June 16, 1987

Mr. James Moorhouse
District Manager
Butte District, BLM
P.O. Box 3388
Butte, Montana 59702

Dear Sir:

As the Idaho representative for the American Wilderness Alliance I wish to comment on the Centennial Mountains, and its suitability for wilderness. Please include this letter in the hearing record and environmental statement on the Centennial Mountains Wilderness Study Area.

I am familiar with the Centennial Mountains area, having hiked into it from the Monida-Red Rocks-Henrys Lake road on the Montana side and the Spencer-Kilgore-Macks Inn road on the Idaho side. This remote mountain range is most valuable as watershed protection for the trumpeter swan at Red Rock Lakes N.W.R. Inroads further into the Centennial Mountains, whether it be for mining, logging, or range improvements will threaten the survival of the trumpeter swan, in addition to the endangered grizzly, and possibly the endangered wolf. The Centennial Mountains serves as high water quality and storage for the Red Rock Lakes N.W.R., farms and ranches in the valleys, and small reservoirs, besides Lima Reservoir and Island Park Reservoir.

O-16

The American Wilderness Alliance urges you to recommend a 92,000 acre Centennial Mountains Wilderness in Montana and Idaho, on both sides of the Continental Divide. The area should especially include the following;

(1) the undeveloped 16,650 acre Sheep Experiment Station

(2) water quality in the proposed wilderness will protect the trumpeter swan and arctic grayling habitat

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Conserve Wild America

78B

G-1

(3) additional prime elk habitat would assist in increasing the elk herd from 500 head, and add a vital link in the elk migration to the desert lands south of Kilgore, Idaho

F-2

(4) the Centennials as a 92,000 acre wilderness area will add a needed component in preserving grizzly habitat as part of the Greater Yellowstone Ecosystem. Your present plan does not guarantee protection of the endangered grizzly

We urge the B.L.M. to coordinate with the U.S. Forest Service to revise the draft E.I.S. to effectively evaluate the impacts of future development on wildlife, scenic values, recreation, and water quality, and to ensure its protection. A 92,000 acre wilderness area will greatly enhance the protection of these renewable resources.

Sincerely yours,

Paul Fritz

Paul Fritz

Box 1772
Boise, Idaho 83701

79A

American Wilderness Alliance
7600 East Arapahoe Road / Suite 114 / Englewood, Colorado 80112 / (303) 771-0380

127 W. Main/su I/ Bozeman, MT./406-586-8175

June 4, 1987

District Manager
Butte District, BLM
Box 3388
Butte, MT. 59702

Dear Sir:

Thank you for this opportunity to comment on the Centennial Mountains Wilderness Study draft EIS. Please include these comments in the official record.

We support Wilderness classification for the full 92,000 acres of suitable land in the Centennial Mountains. The Draft simply does not provide adequate justification for exclusion of any of these lands.

M-32 Specifically we question the economic analysis. It shows economic benefits flowing from timber production without due analysis of costs. Past sale evidence shows timber sales from the area to be clearly below cost. That is, it takes more public funds to develop the area for logging than the logging can return to the treasury.

M-5 The Draft correctly describes damage to the wildlife and recreation resources induced by logging. The economic analysis does not deduct the cost of these damages from the supposed benefits.

Any land allocation decision for public lands must demonstrate a net public benefit for the long term. All projected costs must be analyzed as thoroughly as benefits.

The absence of such analysis is a very serious deficiency. Please supply such analysis as a supplement to the draft. Public involvement in such an analysis will be essential.

Thank you for your consideration.

Sincerely,

Dan Heinz
Field Representative

Working Together To
Conserve Wild America

80A

NEVADA OUTDOOR RECREATION ASSOCIATION, INC.
NATIONAL PUBLIC LANDS TASK FORCE
SOUTHWEST WILDLANDS EDUCATIONAL INSTITUTE (NORA)
NORTHERN ROCKIES BLM TASK FORCE (NORA)

Founded 1958
HONORARY LIFE MEMBERS

June 18, 1987

James Moorhouse, Manager
Butte District, BLM
Box 3388
Butte, MT 59702

Dear Mr. Moorhouse:

Recently a small group of interested conservationists formed the Northern Rockies BLM Task Force under the auspices of the Nevada Outdoor Recreation Association (NORA). A major objective of the Task Force is to coordinate conservationist activities on the public domain in the Northern Rockies with particular emphasis on protecting wilderness quality lands. I am pleased to represent the Task Force with the following comments on the draft EIS for the Centennial Mountains Wilderness Study.

I am personally very familiar with the wild Centennials, having hiked, hunted, and horsebacked throughout much of the roadless country both inside and outside the small 26,000 acre Wilderness proposed in the DEIS. Where else do we have an opportunity to save so much superlative wild country with so little in the way of nonwilderness resources and uses?

M-32 Granted, there are a few isolated pockets of commercial timber but the high costs of mitigating the impacts of roading and logging the steep, unstable soils would exceed the fleeting value of the timber. My experience in the Centennials country tells me that the timber sales would be below cost. Below cost sales are difficult to justify under the best of conditions. But when the subsidy results in a further loss of irreplaceable wildland values it is unconscionablele!

Mineral values are speculative at best in that phosphate mining on the Idaho side of the Divide is not likely to resume until the middle of the next century, if it reoccurs at all. The small amount of domestic grazing that exists within the exterior boundary of the study area is certainly compatible with the Wilderness Act.

Nonmotorized recreation is far more popular in the Centennials than ORV use. Most of the motorized recreation is snowmobiling which is still not that large a use in terms of overall numbers. Further, most of the snowmobiling involves illegal trespass in Odell Creek across a closed portion of the BLM Primitive Area and private land (the Centennial Ranch owned by John Taft).

F-3 Unfortunately, the DEIS avoided the key issues: the interrelationships between the Centennials and the Greater Yellowstone Ecosystem, the integral importance of the 16,650 acre U.S. Sheep Experiment Station lands located in the very heart of the wilderness, and the contiguous roadless lands on the Targhee

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NEVADA OUTDOOR RECREATION ASSOCIATION, INC.
NATIONAL PUBLIC LANDS TASK FORCE
SOUTHWEST WILDLANDS EDUCATIONAL INSTITUTE (NORA)
NORTHERN ROCKIES BLM TASK FORCE (NORA)

Founded 1958
HONORARY LIFE MEMBERS

Mr. James Moorhouse
page two--June 18, 1987

O-7 National Forest to the south. Each of these deficiencies and omissions in the analysis would be remedied by the adoption of the Conservationist Ecosystem Alternative for a 92,000 acre Centennial Mountains Wilderness. We strongly support this forward-looking approach as the best way to safeguard the threatened grizzly bear, the endangered peregrine falcon, many other wilderness-dependent wildlife species, and the watershed of Red Rock Lakes National Wildlife Refuge. The State of Montana sections should be acquired through land exchange and the several low standard vehicle ways should be allowed to return to a wildernes condition.

Lastly, the Task Force believes that the legislation for the Centennial Mountains Wilderness should include a jurisdictional transfer of the 4600 acre Mt. Jefferson/Hellroaring Creek drainage from the Beaverhead National Forest to the BLM. This wild canyon stream--the most distant source of the Missouri River from its mouth--is cut off from the rest of the Beaverhead Forest and would more logically and easily be administered by the BLM as part of the Wilderness.

Please include this letter in the official hearing record for the Centennial Mountains Wilderness Study. Thank you for the chance to participate in this important decision.

Sincerely,

Dan Heinz,
Member of N. Rockies BLM Task Force
Montana Representative, American Wilderness Alliance

81A

P.O. Box 924
Helena, MT 59624

June 10, 1987

Phil Gezon, Project Manager
Butte District Office of the BLM
P.O. Box 3388
Butte, MT 59702

Dear Mr. Gezon:

The Last Chance Audubon Society, having approximately 250 members, would like to offer comment on the Centennial Mountain Wilderness Environmental Impact Statement currently under consideration.

It is our feeling that the proposed action (Alternative 1) is inadequate for this area. It offers too little protection for too little area. This proposal erroneously treats the Centennial Mountains Wilderness area as if it is separate from the Yellowstone ecosystem. This is simply not the case. Alternative I also does little to protect the western portion of this area.

Of the alternatives offered in the EIS draft put out by the Forest Service and BLM, our chapter finds Alternative 2 ("all wilderness") the most acceptable. We strongly recommend that all 72,885 acres be designated wilderness. Some of our reasons are that only Alternative 2:

- protects all drainages and watershed systems;
- protects all bear, elk and moose habitat from logging and other encroachments;
- protects all valuable waterfowl areas in addition to Red Rocks Lakes, such as Lima Reservoir;
- protects peregrine falcons that are now making a promising recovery by nesting in the area;
- protects the entire area from development and damage caused by increased human encroachment;

M-13 We also feel that the differences in economic activity and employment between Alternatives 1 and 2 cannot be a factor. The figures given in the study illustrate that opening more of the area for development does virtually nothing to relieve any current economic problems in the area.

Though our chapter supports Alternative 2 of those offered in the study, we would like to express our desire that the 16,650 acres of land at the Sheep Station Agriculture Research Station be made part of this wilderness area as its location and habitat dictate should be done. To exclude this area is wrong and we encourage the Forest Service and BLM to work toward receiving the necessary authority to be able to include this area in the study.

In conclusion, we support Alternative 2 and the addition of the ARS. Thank you for the opportunity to comment.

Sincerely,

Sue Jackson, President

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MONTANA WILDERNESS ASSOCIATION

Butte District Manager
BLM
P.O.Box 3388
Butte, MT 59702

JUN 1 2 87
BUREAU OF LAND MGMT
BUTTE DISTRICT

June 10, 1987

Dear Sir:

MWA submits the following comments on the Centennial Mountains Wilderness Study/EIS, to supplement the testimony presented by Beverly Magley at the Helena hearing.

O-16 1. The study is deficient in failing to consider the Sheep Station lands. Those lands are the geographical heart of the area, and, according to the Dillon MFP, contain the "very best primitive resource values in the Centennial Mountains." At the very least, the study could have and should have addressed questions such as:

a. is operation of the Station compatible with wilderness?
b. is operation of the Station more or less valuable than closing it and designating the area wilderness?
c. could the Station's mission be directed to research on grazing management in wilderness?

M-10 2. The economic analysis in the study is deficient for several reasons.

a. The analysis is too parochial - only local factors are considered.
b. The analysis does not evaluate the probability that potential employment and income levels under each alternative will be realized. (e.g. due to regional and national factors, it may be impossible to realize 22 timber-related jobs under Alternative 3.)
c. There is no data that places the economic contributions under the various alternatives into perspective with the area-wide economy.
d. The IMPLAN figure of 8.49 jobs per MMBF should be re-evaluated in light of current trends toward increased mechanization in logging and milling and recent increases in productivity (MMBF/job).
e. The economics of timber sales in the area are not discussed. Since sales on the adjacent national forests are typically "below cost", the likelihood of a continuing national subsidy for a timber program in the Centennials, given the current budget crunch, should also be discussed.

P.O. Box 635 • Helena, Montana 59624 • (406) 443-7350

82B

A-1 3. Conclusions regarding wilderness use are not adequately documented. The study claims that designation would not produce a long-term increase in recreational use. The basis for that conclusion seems to be the discussion, under "Projected Visitor Trends" on p.30, stating that, following designation of the Red Rock Lakes Wilderness in 1976, there has been no significant increase in use. Yet the use figures presented show a 6% increase in 1982 over 1981, and an 18% increase in 1983 over 1982, which certainly are significant increases.

Furthermore, the study does not discuss the potential impacts of RARE II wilderness legislation on wilderness use. It is clear that a huge preponderance of the 6 million roadless acres on Montana's national forests will be released for development. Most people go to a place because of its values - its recreational quality, rather than its label. Thus the loss of so much roadless land will undoubtedly result in long-term increases in wilderness use, above and beyond normal growth, as roadless lands are developed and primitive recreation use is concentrated on fewer acres.

4. MWA believes that the entire WSA plus the Sheep Station lands should be designated wilderness. We feel that the net effect of designation on such resources as timber, mining, grazing, and recreation is negligible. (i.e. we agree with the statement on p.72 that "Wilderness designation would have little impact on lifestyles of people living around or visiting the Centennial Mountains.") However, the wilderness values of the area, the wildlife values of the area, and the protection that these values and the water quality of the Centennial Valley would receive from wilderness designation are not negligible, but rather are paramount. Alternative 2 ("all wilderness") clearly maximizes the net public benefit of the WSA.

Sincerely,

Cedron Jones, MWA Council

83A

[illegible]

MR James Moorehouse
Bu. Land Management
P.O. Box 3388
Butte, Montana

Dear Sir:

O-16 This letter requests your office to urge the proposal for a 92,000 acre revision of the Centennial Mountain Wilderness Study on both sides of the continental divide especially to include the 16,650 acre sheep experimental station. This should have been included in the proposal for Wilderness status — it qualifies and should be part and parcel of the submitted plan by your office as well as the forest service who reflects a negative bias by their intransigence regarding wilderness designation in their case.. [illegible] must make this part of the hearing record.

Thank you

Dr. [illegible]
President [illegible] Chapter
Montana Wilderness Assoc.
[illegible], Mont.
1987

84A

ASSOCIATED LOGGING CONTRACTORS INC.
MEMBER

P.O. BOX 871
COEUR D'ALENE, IDAHO 83814

4055 GOVERNMENT WAY
FAIRGROUND CENTER
PHONE (208) 667-6473
TOLL FREE 1-800-632-8743

June 23, 1987

Forest Supervisor
USDA Forest Service
Targhee National Forest
P. O. Box 208
St. Anthony, ID 83445

Regards: Centennial Mountains Wilderness Study Area, USFS/BLM Joint Public Hearings held on and about June 4, 1987 this wilderness study area, and all future considerations for this area.

The Associated Logging Contractors, Inc., submits for inclusion in all records of all USFS, BLM or other public hearings concerning the Centennial Mountains Wilderness Study Area this testimony.

The Associated Logging Contractors, Inc., is the recognized spokesman and representative for Idaho's timber harvesting and road construction portions of Idaho's timber industry. Members of this association have consistently advocated the designation of full multiple use for the 45,500 acre management unit called Centennial Mountains. We submit that any wilderness management or wilderness classification of this area will not result in full multiple-use, and as such, oppose any and all wilderness designation, management, or classification of this area.

K-2

The USFS Targhee National Forest Final Land Management Plan identified very little timber value or forested land in this Centennial Mountains Management area. We submit this conclusion incorrect. The Centennial Mountians Management Area has many forested areas which are of interest to this association and Idaho's timber industry. Our interests and input for full multiple use designation result from our deep concerns in many areas. The following lists some of these:

(A) The loss of any potential future timber base which results from any forested lands within the Centennial Mountains Management area.

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K-2 cont.

(B) The spill over affect of a wilderness designation, management, and/or classification on the full multiple use and future timber supply potential of the 127,700 acre USFS Targhee National Forest Sheridan Land Management Area will be severe. It is submitted that because the southern border of the Centennial Mountains Management Area is a mid-slope border, as well as the northern border of the Sheridan Management Area, that any wilderness designation management, and/or classification, of the Centennial Mountains Management Area will result in some defacto wilderness designation and/or serious restrictions on the future timber supply potential of the Sheridan Management Area. It is submitted that some of these reasons are: Inability to build adequate and/or economical roads and other timber access developments; inability to adequately manage a mid slope border without either very high costs and budget demands, or very conservative timber management of the Sheridan Area near the border which will result in timber management and/or timber harvesting related costs which are above normal, or both; preservationists' demands, lawsuits, and other environmental concerns for the wilderness management of every acre of land designated or classified in a wilderness area can be expected to cause increased USFS management costs, and conservatism of all border areas; the cancerous type growth of wilderness designated lands into the Sheridan Area, which remain unroaded in future planning periods, must be recognized.

(C) Many of the same spill over affects identified in item (B) above will result in adverse effects on any future timber base or management of any areas which are close to or adjacent to the Centennial Mountains Management Area. These include, but are not limited to, USFS Targhee National Forest lands, BLM lands, as well as other public and private lands.

(D) Full mulitple use demands in the future, on the Targhee National Forest, cannot be adequately met if the Centennial Mountains Area is designated, managed, or classified wilderness.

(E) Idaho's already classified acreages (about 4,000,000 acres), and the massive classified wilderness acreages in Wyoming, which is relatively close to the Targhee National Forest, plus the Red Rocks Primative Area in Montana, already meet and greatly exceed wilderness use demands currently and throughout this latest Targhee

84C

National Forest 50 year planning horizon.

Thank you for admitting this testimony into the records, and giving every consideration possible to the designation of full-multiple use without reservation or wilderness management for all of the Centennial Mountains Management Area.

Sincerely,

Leo Musselman
President

LM/lm

85A

THE GREAT BEAR FOUNDATION
P.O. Box 2699
Missoula, MT 59806
(406) 721-3009

May 28, 1987

Mr. Phil Gezon
Project Manager
USDI - BLM
Box 3388
Butte, MT 59702

re:Centennial Mountains DEIS

Dear Mr. Gezon:

Thank you for the considerable thought, effort, and investigation you and your staff, and the Forest Service, put into the Centennial Mountains Wilderness Study DEIS. The document is well written, readily readable, and is a largely realistic and balanced report of the relevant environmental, economic, and social factors that have a rightful place in deciding future land use in the Centennial Mountains.

O-16

However, we are concerned that the best interests of the grizzly bear are not served by the recommendations for protection of only a third of the existing, de facto wilderness. We are very concerned that the existing wilderness will not be retained in entirety while at the same time the sheep experiment station will apparently remain. Because the sheep experiment station will apparently remain, it is even more important that de facto wilderness be formally designated, because security from human harassment, disturbance, and killing is of elevated, paramount concern where sheep grazing is allowed in grizzly bear habitat. If, however, the sheep experiment station were to be closed down, I'd be less apprehensive about loss of the security that will occur if wilderness acreage is developed rather than designated for permanent protection.

The 16,650 acre sheep experiment station is a puzzling enterprise in that it is purportedly for scientific research purposes but the research conducted there is not dependent on that site and at least some of the research appears to be of debatable scientific merit. While we recognize that the sheep station has been taken out of your jurisdiction, its presence and its continued operations do have real and serious potential to affect grizzly bears and other wildlife, and its role is not adequately depicted in the DEIS.

F-2

We note with interest that wolves were sighted in the Centennial Wilderness Study Area in the 1960's and 1970's, but not in the 1980's. The DEIS says "no observations have been reported in the past 10 years, and wolves are not believed to presently inhabit the study area. This information is particularly striking because documented sightings include a sighting of eight wolves by USFS personnel, and a sighting of four wolves by Idaho Fish & Game, with both sightings in the mid 1960's and none documented in the past ten years. This information is of interest to us because it suggests a decline of wolves that could possibly be due to shooting, poisoning, or other factors that could also have an effect on grizzlies. We think that you should seek more information on this matter as part of preparing the upcoming final EIS. Again, this matter is related to woldlife security from human harassment, disturbance, displacement, and killing and is germane to the wilderness designation decision.

Board of Directors
Arnold Bolle • William Callaghan • Craig Campbell • Lance Olsen • Frank Ponikvar • Mart Williams

85B

I want to credit and commend you and others for recognizing and acknowledging that historic overgrazing has caused problems (DEIS, p. 32); that human opportunity for solitude in the study area is outstanding (DEIS, p. 44); that "Wilderness designation would have significant positive impacts upon habitats for elk, fisheries, wolverine, grizzly bears, Canada lynx," accipiters and spruce grouse and that wilderness designation would "also have positive impacts on fishery, waterfowl, and bald eagle habitats in the Centennial Valley" (DEIS, p.56), and that "Grizzly bear, wolverine, and lynx would benefit from cover values and a remote, roadless wilderness environment. Most adverse affects upon these species came from their incompatibility with development activities". (DEIS, p.56). All emphasis added.

Development of timber and mineral resources would in all liklihood add to the soil-water problems caused by historic overgrazing, would diminish human opportunity for solitude, and would subject the various wildlife and fish species to further effects of development.

We want to be kept up to date about any oil-gas APD, and ask to be placed on a mailing list that will advise us of any APD. Please confirm in writing that you will do so.

We'd like to see attention given to winter horse logging in acreage that will be harvested. Horse logging can combine more jobs with fewer environmental effects, as opposed to mechanized logging that can combine fewer jobs with more harm to the environment. Skilled horse loggers can remove selected trees over considerable distance without the need of roads. We expect that you will search out information on this possibility and display it in the final EIS.

M-3 But it doesn't look like timber will offer much of an economic future, if it depends on the five inch dbh stuff mentioned in the DEIS. It seems that, in proposing to subject this skimpy timber to harvest, you could end up causing more harm than the limited good could offset. Assistant Secretary Doug McCleery once said that dependency on marginal timber can threaten community stability. The final EIS should give a much more explicit accounting of this trade-off, specifically as related to such skimpy timber. On such acreage, you might as well go ahead and recommend wilderness designation.

F-2 cont. Oil-gas development, plus timber development, and the roads for both activities, plus ORV traffic, plus the effects of the 16,650 acre sheep experiment station in the middle of the study area could have very debilitating cumulative effect on the grizzly bear. The final EIS must display this basic fact of combined, cumulative effect. Vegetation mapping, GIS analysis, and cumulative effects modelling should be undertaken in order to evaluate effects. Trade-offs should be identified, if feasible, in order to avoid future actions that could jeopardize the grizzly bear and other sensitive wildlife of the Centennial Mountains.

One issue of high interest to us is that 15 grizzlies were (documented) killed between 1970 and 1974, in the Henry's Lake area and that Frank Craighead in 1974 said that the Centennials are of importance when grizzlies disperse from Yellowstone. Grizzlies may disperse from Yellowstone for a variety of reasons which can include population growth and/or loss of access to habitat elsewhere in or around the park and/or variations in annual precipitation (e.g. drought) that can cause grizzlies to travel far and wide in search of food. Even a population that is shrinking in terms of numbers can disperse over greater acreage development or climate dictates. The upshot is that the importance of the Centennials may be extremely high in certain years of drought, and/or that the importance of the Centennials may increase considerably as development takes (safe) access away from grizzlies in other areas or prompts their avoidance of other areas. I'll ask Dick Knight his opinion on this matter by showing him a copy of this letter.

Another related concern is that, according to information provided to us by Charles Parker

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F-2 cont. (sheep experiment station research leader) in a letter dated October 9, 1985, herders on the sheep station are allowed to kill black bears "that are observed killing sheep". Thus, potential mistaken identity killing of grizzly bears has to be counted as one of many cumulative effects on grizzlies in the Centennials. And we find it odd that, according to the same information, the sheep station has no policy on killing wolves.

The sheep station also uses herbicides and fertilizers to change vegetation species. We see need for more information on this matter, but it may also have cumulative effect on grizzlies.

In 1978, the BLM Dillon Area Manager wrote a memo to the BLM District Manager saying, in part, "It is highly probable that habitat in the Centennials would be more suitable for permanent grizzly and wolf use if habitat conflicts such as indiscriminate vehicle use" and other conflicts were eliminated and that "observations collected to date strongly suggest the area would be permanently occupied if security and freedom from disturbance and predator control were provided". These conclusions seem supportable and reasonable, and should be considered in light of the cumulative effects now occuring on the sheep station alone.

O-16 cont. Again, we realize that the sheep station was taken out of joint USFS-BLM jurisdiction in 1981, and that it was not included in your study leading to the DEIS. However, the future of threatened and endangered species in the Centennial Mountains will certainly be affected by the sheep station's own cumulative impacts; the existence of these impacts adds to the importance and relevance of remote, roadless acreage elsewhere in the Centennials and should therefore be considered in your final recommendations for wilderness designation.

Sincerely,

Lance Olsen
President

cc: Dick Knight IGBST
John Gatchell
IGBC
John Weaver
Hank Fischer
Ed Louis/Louisa Wilcox
Joseph Sax
Tom McNamee
Paul Schullery
Bud Journey

86A

James Phelps, Public Lands Chair
Montana State Audubon Council
2110 Bradbrook Court
Billings, Montana 59102

June 12, 1987

District Manager, Butte District Office
Bureau of Land Management
Post Office Box 3388
Butte, Montana 59702

Dear Sir:

Please consider this comment upon your Centennial Mountains Wilderness Draft Environmental Impact Statement (draft EIS) from the Montana Audubon Council. The Council is made up of the nine National Audubon Society chapters that are located in Montana. Our membership is about 4,000 individuals. Our organization is vitally interested in these kinds of proposals because of our continued interest in wildlife and the environment.

Since we are truly a "grassroots" organization, you may very well receive comment from individuals that are members of our Society and, as well, local chapters. They may differ in detail but not in overall goals.

I personally have some familiarity with the proposed wilderness. Prior to moving to Billings some 15 years ago I lived in southeastern Idaho and had opportunity to be in the Centennial Mountains on both sides of the Montana-Idaho border. I was well aware when the Simplot interests prospected for phosphate and actually mined in the years 1956 thru 1958. The short season was given as the reason for abandoning the operation; I believe there are sufficient deposits that are more accessible than these and with a longer mining season, too. I don't believe these claims will be mined in the foreseeable future--in fact, I doubt if ever.

The Centennial Mountains are geologically unique. The rise in the northern face, more than 3,000 vertical feet in less than a mile, testifies they are also "earthquake" country. The small core area of the Centennials in Montana recommended for wilderness is insufficient protection for watershed that feeds into the Red Rock lakes.

O-16 Removal of the Sheep Experiment Station lands really tears the heart out of the wilderness proposal. As is well known, these were transferred by Congressional action--which I opposed because of the implications now coming home to roost--nonetheless, these lands should have been studied for their wilderness potential. Just because the lands are now administered by the Department of Agriculture doesn't mean they have changed their characteristics. The refusal by that agency to participate in the studies doesn't win it any "brownie points." The refusal of Region 4 of the Forest Service, thru the Targhee National Forest, is consistent with the Forest Service's refusal to act constructively in a unified manner. The Idaho side represents more than half of the study area and is just as high a quality for wilderness as the lands on the Montana side. With land control in several agencies and even those in the same Department can't get together constructively it is sad indeed.

86B

To my mind, the draft EIS fails to analyze in an adequate manner the impacts of proposed developments in areas that are not recommended for wilderness. The "Greater Yellowstone Ecosystem" and the "Centennial Mountains Wilderness Study Area" share many of the same characteristics. J-5 What about the water quality needed for arctic grayling? What about the impacts of logging on sediment into Lima Reservoir? Has past sheep and cattle grazing caused erosion that is beyond that what is acceptable? I have already mentioned the need for protection of the watershed of the Red Rock Lakes, really a series of marshes. Montana has species of special concern--apparantly Idaho hasn't moved this far--that need to have study. These species include the wolverine, Canada lynx, hoary marmot, great grey owl, the three accipter hawks (goshawk, Cooper's, and sharp-shin), long-eared owl, and prairie falcon. What about these?

A-2 I urge reconsideration of the study area to address the above-named issues, and in addition I believe the southern boundary is at an awkward location in many places. By that, I mean at the middle of the slope. Could not protection against certain kinds of adverse development be considered for the full slope beyond the location proposed. In other words, could not a more natural boundary be worked out greater than what is now proposed?

Very truly yours,

James Phelps

copies

Rep. Stallings
Rep. Pat Williams

87A

THE WILDERNESS SOCIETY

June 18, 1987

Mr. Jim Moorhouse, District Manager
Butte District
Bureau of Land Management
Box 3388
Butte, Montana 59702

Dear Mr. Moorhouse:

The Northern Rockies and Intermountain offices of the Wilderness Society and the Northern Plains office of the Sierra Club are pleased to submit comments on the draft Centennial Mountains Wilderness Study Environmental Impact Statement. We appreciate the openness and helpfulness your staff has displayed. In all cases, except one discussed below under the Economics section, we were able to get the supplemental materials we requested.

While we found the DEIS helpful, it is a flawed document. Following are our specific concerns with the draft EIS and our recommendations.

I. The DEIS Incorrectly Recommends Partial Wilderness

The DEIS Preferred Alternative recommends 26,248 acres as wilderness. This includes 21,774 acres of BLM Primitive Area and 4,474 acres of Beaverhead National Forest. The DEIS's conclusions in support of this Alternative seem to rest on the following rationale:

- the portion of the Study Area west of Matsingale Creek is needed for timber harvest.
- the Targhee portion of the Study Area need not be designated since no timber harvest is planned on Targhee National Forest lands and there is no manageable boundary.
- the Sheep Station cannot be studied for wilderness because of a statutory barrier.
- wilderness for the entire Centennial Range to enhance the Greater Yellowstone Ecosystem need not be considered because the ecotypes in the Centennials are represented elsewhere in the Ecosystem.

NORTHERN ROCKIES REGIONAL OFFICE
105 W. MAIN STREET, SUITE E, BOZEMAN, MT 59715
(406) 586-1600

87B

A. Area West of Matsingale Creek

In the All Wilderness Alternative, the DEIS at page 56 recognizes that:

"Wilderness designation would have significant, positive impacts upon habitats for elk, fisheries, wolverine, etc..."

"Elk would be assured of fall hiding cover effectiveness on about 13,200 acres in the western portion, which presently serves as migrational staging, late fall, and early winter habitats for 300 to 500 elk."

"Key species such as elk...would benefit" if the entire Study Area was designated Wilderness.

The Preferred Alternative at pages 52-3 states:

"2,500 acres of elk fall and migrational staging habitat and 3,000 acres of winter elk habitat may be disturbed in the short term by timber harvest."

"Loss of cover due to timber harvest...could bring about a more restrictive hunting season, plus a short-term (25-30 years displacement of elk in fall and winter until cover is restored."

"In the portion not designated wilderness [western end] 11,297 acres of unstable soils may be disturbed by oil and gas or logging activity."

"The effects of road building and logging... could significantly affect soil stability, water quality, and silt deposits in...Lima Reservoir."

It is clear from the above excerpts that the All Wilderness Alternative will enhance wildlife populations. On the other hand, logging in the western portion will result in some wildlife decline in the area. It is interesting to note that the DEIS does not contemplate any loss in RVD's for hunting between the two alternatives (see pages 51 and 56) yet the text states that there may be a decline in elk. This would lead one to assume that RVD's would decline as well if hunter success decreases.

Reducing water quality at Lima Reservoir will affect not only agriculture but trumpeter swans. In recent years the swans have started to nest at the Reservoir. This is because the lakes at Red Rocks have started to silt in as a result of erosion. The BLM should not be recommending an alternative which might have an adverse effect on a threatened species.

Not only will timbering result in erosion of highly unstable soils and produce adverse effects on trumpeters and elk, it is a money-losing proposition (see the discussion under Economics).

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B. The Targhee Portion of the Study Area

The implied reasons for not including Targhee lands are manageability and that nothing will happen to them if no wilderness is designated.

The principal management concerns raised appear to be the Sheep Station and manmade impacts on the east and west. The reasoning seems to go that without the Sheep Station as wilderness, an alternative, such as Alternative 6, makes no sense in that boundaries are indefinite and there are impacts on both sides. This argument does not stand up. First, the Sheep Station not only can, but must, be included in an alternative. (See discussion on Sheep Station.) With the Sheep Station wilderness, the eastern and western portions of the Targhee become reasonable additions. Even without the Sheep Station these two areas are good wilderness candidates. A draft Wilderness Inventory done for the two Forests and the BLM concluded that, although some human influences have occurred, "The study area appears to have been affected primarily by the forces of nature..." (copy attached). The Inventory goes on to note that some of the disturbances are substantially noticeable but that boundary adjustments were made to exclude them. Congress, in numerous statutes including the Endangered American Wilderness Act (1976) has taken the opportunity to comment on outside sights and sounds. In that Act Congress chastised the Forest Service for excluding areas from its wilderness recommendations simply on the basis that manmade activities could be viewed from within a proposed wilderness. Since these areas can be excluded from the proposal and Congress has indicated that their presence should not be a barrier to designation, there is no reason to exclude either the east or west portion from a wilderness recommendation.

K-11 The DEIS cites the fact that no management activities are planned in the area as a reason for not recommending it wilderness (pg. 11). This seemed inconsistent with the Land Management Plan for the Targhee which identifies some 9.2 mmbf of timber as being suitable for harvest from 1991 on. A letter from Forest Supervisor John Burns (copy attached) states that the LMP allocates the area to non-development, i.e. no programed or unprogramed timber harvest, and that the suitable timber is for information purposes only.

Mr. Burns' assurances do not jibe with the Land Management Plan for the Targhee. The LMP at page 169 states:

"Timber will only be harvested from available, capable, and suitable forest lands with the following exceptions:
...2. As environmental assessment indicates stand conditions, insects, or pathogens pose an unacceptable threat to adjacent stands or wildlife habitat."

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At page 176 the LMP states:

K-11 cont. "In any locality where an environmental assessment indicates stand mortality, conditions, insect or pathogens are such as to cause the stand to be of low utilization for wildlife, or in which insects or pathogens pose a significant threat to adjacent stands, reproduction, understory, or future growth and wildlife potential, the Regional Forester may approve deviation from the standards and guidelines in Forest-wide or management area direction in order to cope with the situation."

"In the event of a catastrophic occurrence such as fire, blowdown, insect epidemic, ...or the reasonable expectation of such an occurrence, the Regional Forester may approve deviations from the standards and guidelines..."

These two sets of quotes illustrate that the Targhee Forest has no intention of letting natural processes occur on the Forest. Any of several types of activities may result in exceptions to the Plan. There is no assurance that the Centennials will not be timbered for any of a multiple of natural occurrences.

The LMP calls for a tripling of Douglas Fir harvest between 1991 and 2000 (LMP, page 170). In order to meet these volumes, it seems almost certain that the Targhee will have to enter the Centennials sometime after 1991.

The assertions in the DEIS concerning the future of the Centennials are incorrect. The DEIS must be redone to reflect a strong likelihood that timber will be harvested on the Targhee side and display the consequences.

C. The DEIS Fails to Include the Sheep Station in its Wilderness Analysis

O-16 The DEIS (at page 25) states that "Neither the BLM nor the Forest Service has jurisdiction or authority to conduct wilderness studies of this land (Sheep Station)". However, unlike the rider on the Interior Appropriations bill which prohibited the expenditure of funds to study the Sheep Station, its transfer to the ARS carried no such stipulation.

The purpose of an EIS is to fully disclose the consequences of both the proposed action and any other reasonable alternatives. The draft EIS does not do this because there is no alternative which includes the Sheep Station as wilderness. The DEIS relies on the transfer of jurisdiction as the reason for not including it as an alternative. This is erroneous. Several court cases have held that a statutory barrier to an alternative does not preclude the agency from including it especially if the alternative will result in greater environmental benefits. (see Iowa Citizens for Environmental Quality, Inc. v. Volpe. 487.F.2d 849, 851 (8th Circuit, 1973), also Kilroy v. Ruckelshaus, 738 F.2d 1448, 1454 (9th Circuit, 1984)).

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O-16 cont.

Clearly, including the Sheep Station as wilderness in an alternative will have greater environmental benefits. The Station sits in the middle of the Centennial Range and drains into Red Rocks Wildlife Refuge. The DEIS states that one of the agency's prime goals in recommending wilderness on its lands north of the Continental Divide is watershed protection for the Refuge. Including the Sheep Station in an alternative will enhance this goal of the BLM.

An alternative which includes the Station will also result in more manageable boundaries for the BLM. Even if no lands on the Targhee are included, the Continental Divide is a better boundary than the current one.

Displaying the Sheep Station in an alternative will make it easier for decision-makers, in this case Congress, to determine what the boundaries should be for the Centennial Mountains wilderness. Instead of relying on assertions from various factions, an agency alternative which thoroughly discusses the values of the Sheep Station will allow a decision to be made on more rational grounds.

An early Wilderness Inventory done jointly by the Targhee and Beaverhead National Forests and the BLM (copy attached) documents the wilderness qualities of the Sheep Station concluding that the study area (which includes the Sheep Station) "offer[s] a wide diversity of primitive and unconfined recreational activities and outstanding opportunities for hunting, fishing, hiking, horseback riding, and camping". This document demonstrates that the Sheep Station would enhance the environmental qualities of the Centennials. The current DEIS should be redone to include an alternative which displays the Sheep Station as Wilderness.

D. The DEIS Fails to Consider the Effect Designating the Centennials Wilderness Would Have on Enhancing the Values of the Greater Yellowstone Ecosystem

F-2

The DEIS states (pg. 42) that "[a]lthough adjacent to the Yellowstone Area, the Centennial Study Area does not add to the diversity of the ecosystem. The ecosystems which make up the Centennials area represented elsewhere in the Yellowstone Area." This argument misses the point. It certainly is true that all three of the major habitat types of the Centennial Study Area occur elsewhere within the Greater Yellowstone Ecosystem. But it is also true that the populations of many of the birds and mammals within the Study Area are part of a single population or meta-population that takes in much of the adjacent Yellowstone area. Examples would almost certainly include the wolverine, fisher, grizzly bear, Canada lynx, northern goshawk, Cooper's hawk, prairie falcon, and great gray owl (all of these are either federally listed species or state-listed species of special concern; see pp. 36-7). Note that by and large these are species

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F-2 cont.

that have large area requirements or typically occur at low population densities. Other species such as the bald eagle and trumpeter swan do not occur within the Study Area, but depend upon food or habitat resources that derive from the Centennials. Here too we are dealing with single, Ecosystem-wide populations or meta-populations.

In short, from the point of view of species viability, the Centennial Study Area is very much a part of the Greater Yellowstone Ecosystem. Indeed, given the rarity of some of these species (e.g., grizzly bear, wolverine) it may well be an essential part. Thus, the DEIS must address how wilderness could enhance the viability of these species Ecosystem-wide.

Wilderness for the Centennials may well help conserve the biological wealth of the area and the larger Ecosystem. Here, the DEIS speaks for itself. On page 52, the document notes that wilderness designation would have positive effects on populations of elk, wolverine, grizzly bear, Canada lynx, northern goshawk, balk eagle, and trumpeter swan. These are disturbance-sensitive and/or late successional species -- precisely the animals of highest conservation priority within the Ecosystem. All of them have shown alarming declines on other parts of their ranges.

We certainly do not need to increase habitat for the early successional species that are already common either within the Ecosystem or on the adjacent private lands. Moreover, the DEIS even admits (page 52) that populations of some popular early successional species (moose, mule deer) would not be appreciably aided by the clearings created by logging. Such species are either limited by other factors (winter habitat) or already abundant within Study Area.

II. The DEIS does not Explain the Rationale for its Recommended Alternative

K-11 cont.

Nowhere in the DEIS can one find any reason for choosing one Alternative over another. The consequences, as far as the DEIS goes, for each alternative are displayed. But no analysis is done to document why one Alternative is better than another. It is left to the reader to gather by implication what is the rationale for the Preferred Alternative. This is clearly inadequate. The DEIS must display not only the consequences of each alternative but the reasons for choosing one over the other.

III. The DEIS Fails to Include all Eligible Wildlands in its All Wilderness Alternative

Conservationists propose a 92,000 acre wilderness for the Centennial Mountains. The All Wilderness Alternative in the DEIS only encompasses 72,885 acres. The DEIS is thus flawed in that it does not contain an alternative which includes all roadless lands in the Range. O-5

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O-5 cont.

The draft Wilderness Inventory completed for the two Forests and the BLM concluded that some 89,500 acres (including the Sheep Station) were natural and possessed outstanding opportunities for primitive and unconfined recreation and ample opportunities for solitude. In addition, it listed supplemental values including the Continental Divide Trail, archeological resources, and at least two threatened and endangered species.

Conservationists add approximately 3,000 acres to the draft Wilderness Inventory assessment. Our boundary includes the lands acquired by the BLM on the western edge of Price Creek in the First Continental land exchange. It also includes several State sections which, we understand, are currently being considered for exchange as well. Both these additions will enhance the wilderness qualities of the Centennials. The area west of Price Creek provides important fall and winter range for elk. The State sections will provide additional protection for Red Rocks Refuge, a goal of the BLM.

Our proposal excludes the East Fork of Dry Creek road, the phosphate mining area on Taylor Creek and road, the Keg Springs road, and the Tin Cup slate mine and road.

The conservationist proposal provides additional protection for the Centennials over and above that of the DEIS's Alternative 2. It includes readily identifiable roadless lands which should have been analyzed by the BLM but were not. The DEIS should be redone to include a 92,000 acre all-wilderness alternative.

IV. The DEIS Fails to Adequately Assess Economics and Does Not Provide Sufficient Information to Make an Informed Decision

The BLM contends that the issue of below-cost timber sales does not apply to the Centennial Mountains WSA. The basis for this position is an analysis presented in the "Centennials EIS Timber Sale Below-cost Paper". Unfortunately, the methodology employed in this paper is seriously flawed. Its primary shortcoming is the inclusion of income taxes as an efficiency gain, or benefit, of timber production. For reasons discussed below, tax revenues are not considered in standard benefit-cost analysis and should not be used to determine the extent of below-cost timber sales in the Centennial Mountains. If tax revenues are excluded from the analysis, both timber sales considered by the BLM lose money. The extent of the loses from these sales is consistent with other studies of below-cost timber sales in the immediate vicinity of the Centennial Mountains.

"Below-cost" is the term commonly applied to timber sales on public lands that fail to generate timber receipts sufficient to cover the government's cost of making the timber available for harvest. Although various methodologies have been used in studies of below-cost timber sales, they all share a common focus

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on attempting to determine whether or not investments in timber production are worthwhile.

The standard tool used by economists to make such determinations is benefit-cost analysis. Benefit-cost analysis gives policy makers a means of distinguishing between good and bad investments. More precisely, it allows them to distinguish between investments that increase the value of goods and services produced in the economy from those that do not. In the jargon of economics, the former is known as an "efficient," and the latter, an "inefficient" investment.

To avoid confusion, certain economic impacts that do not yield information about the value of goods and services produced by an investment are not considered in benefit-cost analysis.

Tax revenues are a prime example. Virtually all public expenditures affect tax collections. Welfare payments, investments in high technology -- even passing money out on the street -- can all lead to an increase in taxes. If this were the sole criterion used in selecting investments, a government might soon find itself giving away money to doctors and lawyers simply because they are taxed at a higher rate than those with lower incomes.

While clearly an important impact of any public investment, tax revenues reveal nothing about the value of goods and services produced by investments. They are therefore useless in distinguishing efficient from inefficient investments and for this reason are not considered in benefit-cost analysis.

The BLM study compares the benefits and costs of two representative timber sales in the Centennial Mountains -- the Price-Peet sale and the Coral Creek sale. The government's cost for each sale is listed as $26.94 per thousand board feet (MBF). In return, the government received $12.44 per MBF in timber receipts for the Price-Peet sale and $8.61 per MBF in receipts for the Coral Creek sale. In addition, each sale was estimated to have caused an increase in state and federal income taxes of $20.43 per MBF.

As discussed above, tax revenues should not be considered an economic benefit of the timber sales. Accordingly, instead of producing an excess of revenues over costs as stated by the BLM, both sales in reality returned considerably less than they cost the government. Specifically, the Price-Peet sale lost $14.50 per MBF and the Coral Creek sale lost $18.33 per MBF. This represents a loss of 54 cents and 67 cents, respectively, for each dollar invested in the two sales.

These returns are consistent with an earlier study of below-cost timber sales conducted by The Wilderness Society for the Targhee and Beaverhead National Forests, the two national forests that share in the management of the Centennial Mountains WSA.

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This study found that over the period 1979 to 1984, the Beaverhead National Forest lost an average of 78 cents and the Targhee National Forest an average of 46 cents for every dollar invested in timber production. Total losses for both forests averaged about $2 million per year over this six year period.

A. Economic Analysis Used in the DEIS

M-19 The economic analysis presented in the Centennial Mountains Wilderness Study/Draft Environmental Impact Statement (DEIS) is incomplete and misleading. As in the analysis of below-cost timber sales, the DEIS focuses on a narrow subset of economic impacts of the different alternatives to the exclusion of their relative costs and benefits. While the impacts presented -- local income and employment -- are certainly important to consider, they provide the public with no way of judging which alternative produces the largest net social benefits. Moreover, the DEIS appears to exaggerate the income and employment impacts of snowmobiling and to exclude a number of other sources of recreation income and employment known to be important in adjacent areas.

At a minimum, the Centennial Mountains DEIS should display the value of the different benefits and costs produced by each alternative. The DEIS does present the recreation use levels and the quantity of other outputs, such as timber and grazing, associated with each alternative. From this one can tell that the preferred alternative results in 100 fewer recreational visitor days (RVDs) of snowmobiling and roughly 2 million board feet less timber production than the no wilderness alternative. However, there is no way to tell from the information presented in the DEIS whether or not this represents a worthwhile trade-off.

M-20 In fact, since timber production in the Centennials loses money, the lower timber harvest under the preferred alternative would actually save society over $40,000 per year. The loss of snowmobiling opportunities, on the other hand, represents a loss of only $600 per year based on the value for snowmobiling currently used by the Forest Service ($6 per RVD).

While we were successful in obtaining the Timber Economics White Paper from the BLM for further analysis, as of the date of these comments we have been unable to get documents which explained how the BLM developed its employment and income figures for each alternative. A telephone call with Darrell McDaniel determined that Dave Nelson, a BLM economist had prepared the data. Two conversations with Mr. Nelson failed to produce any material. He indicated that there was not written documentation, to his knowledge, explaining how the numbers in the DEIS were derived. As such we are unable to critique this section since there is no data available in the document or, apparently, in the files to support the conclusions drawn in the DEIS.

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M-21 We would note, however, that on its face the data in the DEIS is suspect. For example, the employment and income associated with snowmobiling appears to be greatly exaggerated. According to the DEIS, the 596 RVDs of snowmobiling under the no wilderness alternative generates eight jobs and nearly $93,000 in local income. This represents a "multiplier" of 13.4 jobs and $155,399 in income for every 1,000 RVDs of snowmobiling.

In contrast, the Beaverhead National Forest, which manages a portion of the Centennial Mountains WSA, assumes that for every 1,000 RVDs of snowmobiling only 0.8 jobs and $4,000 in income will be generated. In other words, the DEIS assumes that 17 times more employment and nearly 40 times more local income will be generated by snowmobiling in the Centennial Mountains than on the nearby Beaverhead National Forest.

Using the multipliers developed on the Beaverhead, the 100 fewer RVDs of snowmobiling under the preferred alternative would cause a reduction of less than one-tenth of one job and $400 in local income, rather than the one job and over $15,000 in local income claimed in the DEIS.

M-22 The DEIS also appears to exclude the income and employment impacts of all types of recreation other than snowmobiling and elk hunting. While these are the only types of recreation for which employment and income are reported, they account for less than 60 percent of total recreational use in the Centennial Mountains WSA. On the Beaverhead National Forest, recreation other than big-game hunting and snowmobiling account for over a third of all recreation income and employment.

V. Recommendations

The draft EIS on the Centennial Mountains Wilderness Study Area is fatally flawed in a number of respects as discussed above. The Wilderness Society urges the BLM to withdraw the document and correct its defects so that when reissued it accurately reflects the choices the public and decision-makers have for the future management of the Centennials.

Thank you for the opportunity to present our comments.

Sincerely,

Michael D. Scott
Regional Director
Northern Rockies

87K

WILDERNESS INVENTORY
WILDERNESS SUMMARY SHEET

I. LOCATION

Area name: Centennial Mountains

BLM, District: Butte State: Montana

FS, Forest: Targhee Region: Intermountain

FS, Forest: Beaverhead Region: Northern

SEA, U.S. Sheep Experiment Station: Dubois

II. SUMMARY

A. Results of wilderness characteristics and analysis.

1.	Does the area appear to be natural?	X yes	___ no
2.	Does the area offer outstanding opportunities for solitude or a primitive and unconfined type recreation?	X yes	___ no
3.	Does the area meet any of the size requirements?	X yes	___ no
4.	Does the area have supplemental values?	X yes	___ no

B. Resulting map.
Attach a map showing inventory unit, roads, area with possibility of returning to a natural state, recommended boundary of wilderness study area.

III. RECOMMENDATION

Check one:
___Area should be approved.
___Area does not qualify for wilderness study.
X A portion of the area should be approved for further study and reported to the President. The restrictions imposed by Section 603 will no longer apply (reference to map) on the remainder of the area.

87L

IV. APPROVAL

Bureau of Land Management

District Manager: ____________________

Date: ____________________

State Director: ____________________

Date: ____________________

Forest Service

Region I Forest Supervisor: ____________________

Date: ____________________

Regional Forester: ____________________

Date: ____________________

Region IV Forest Supervisor: ____________________

Date: ____________________

Regional Forester: ____________________

Date: ____________________

SEA, Sheep Experiment Station

Director of Station: ____________________

Date: ____________________

Area Director: ____________________

Date: ____________________

CENTENNIAL MOUNTAINS
WILDERNESS INTENSIVE INVENTORY AUMMARY

I. Size

The 96,730-acres Centennial Mountains study area consists of the following segments:

Centennial Mountains Primitive Area (BLM)	21,774 acres
Contiguous roadless public land (BLM)	8,256 acres
Sheep Experiment Station range (SEA)	16,650 acres
Centennial Mountain Land Use Plan, Management Area 1, Targhee National Forest	38,750 acres
RARE II 4-962, Mount Jefferson, Targhee National Forest	6,700 acres
RARE II 1-962, Mount Jefferson, Beaverhead National Forest	4,600 acres

The study area consists of most of the Centennial Mountain range, with the Continental Divide forming the crest. It is 38 miles north of St. Anthony, Idaho, and 20 miles west of Yellowstone National Park. Access to the unit from the south is from the Yale-Kilgore Road that runs parallel to and south of the mountains. Access from the north is via the Centennial Valley road. There are both state and private lands within the study boundary; all have been excluded from the study.

During the intensive inventory several boundary adjustments were made to exclude significant human influences on the apparent naturalness of the area.

A. Exclusions on BLM and SEA Land

The following areas on BLM and SEA land have been excluded from further study. The letters in parentheses correspond to lettered areas shown on the map at the end of this section.

1,024 acres for cumulative impacts of timber cutting, vehicle ways, habitations, fences (A).

61 acres for recent clearcuts north of the Price-Peet road (B).

5 acres for a road corridor along the Price-Peet road (S).

1,063 acres for timber cutting and vehicle ways in the Bean Creek drainage (C).

2 acres for the East Fork of the Bean Creek road (T).

671 acres for timber cutting and vehicle ways in Curry Creek (D).

824 acres for timber cutting and vehicle ways in Corral Creek (N).

228 acres for an area south of Lakeview, Montana, where a ski lodge, a road, and motorized vehicle use are authorized by a temporary use permit (H).

178 acres for open pit phosphate mining and haul roads (J and L).

B. Exclusions on Centennial Mountain Land Use Plan Management Area 1

The following exclusions were made on the portion of the study area known as Centennial Mountain Land Use Plan Management Area 1:

80 acres for a road corridor along Keg Springs road to where it ends at the state line (U).

70 acres for a road corridor along the East Fork of Dry Creek road to where it ends at the state line (V).

1,483 acres for open pit phosphate mining, roads, and a contiguous terracing project on Taylor Mountain (K).

224 acres for numerous small mining pits and constructed roads west of Carrot Canyon in the vicinity of Taylor Mountain (M).

145 acres for timber cutting and roads in the Arange Creek sale (R).

85 acres for timber cutting and roads in the Willow Creek sale (O).

128 acres for timber cutting and roads in the Ching-Moose Creek sale (I).

277 acres for timber cutting and roads in the Ching Creek sale (G).

107 acres for timber cutting and roads in another Ching Creek sale (F).

235 acres for timber cutting and roads in the Cottonwood Creek sale (E).

64 acres for a watershed restoration project in the basin at the head of Hotel Creek. It consists of contour furrows spaced at 60-foot intervals (Q).

C. Exclusions on RARE II Areas

The two RARE II areas, 4-962 and 1-962, were placed in the further planning category by the Forest Service. In the development of this cooperative study based on BLM wilderness inventory procedures, the Forest Service Wilderness Attribute

Rating System (WARS) data were used to determine that one area that lacks wilderness characteristics should be excluded:

300 acres for a watershed management Project (trenching) in the Rock Creek basin (P).

Although some of the human activities that led to exclusion of areas from wilderness consideration have impacts beyond the specific areas where they occur, boundary adjustments were made to the edge of each specific impact. This was done because BLM directives (Organic Act Directive 78-61, change 2, p.5) state that a "zone of influence" should not be created around an impact, but that a boundary adjustment should be made to the edge of the impact or to the closest legal description. (A "zone of influence" would be included in the Suitability Report/Environmental Impact Statement.)

The entire acreage excluded by these boundary adjustments totals 7,256 acres, distributed as follows:

Centennial Mountains Primitive Area, contiguous roadless public land, and Sheep Experiment Station range	4,056 acres
Centennial Mountain Land Use Plan Management Area 1, Targhee National Forest	2,900 acres
RARE II 4-962, Mount Jefferson, Targhee National Forest	300 acres

The study area remaining after these exclusions comprises 89,474 acres.

II. Naturalness

The Centennial Mountains Study Area encompasses thirty miles of the Continental Divide from Sawtell Peak on the east to Sand Creek on the west. The elevation ranges from 6,800 feet to more than 9,800 feet at the summits of Baldy, Slide, Taylor, and Sawtell mountains and Mount Jefferson. The northern section of the range is the most rugged; it has a steep scarp slope that rises nearly 3,000 feet from the valley floor to the crest in less than a mile.

The climate of the study area is harsh, with an average frost-free season of only ten days. The longest and shortest recorded frost-free seasons are 34 days and one day, respectively. Temperatures range from a recorded low of minus 60°F to a recorded high of 91°F. The average monthly temperature is 34.8°F. Precipitation on the Continental Divide averages about 30 inches per year; it drops to 15 inches at the extreme western end of the study area. Most precipitation comes in the form of snow.

The lower slopes of the study area are composed primarily of Douglas-fir and lodgepole pine, with scattered stands of spruce, alpine fir, and quaking aspen. Creek bottoms are often marshy and heavily

vegetated. Slopes and ridgetops are more open, with stands of mature timber enclosing small meadows. As elevation increases, there is a gradual change from Douglas-fir forests to large high-elevation meadows with scattered stands of subalpine fir, spruce, and whitebark pine. Large, open basins and alpine meadows alternate with steep headwalls, rugged cliffs, and talus slopes. In some of the higher basins, vegetative cover is sparse, consisting of sod-forming grasses or scattered stands of whitebark pine. Numerous drainages and perennial streams that originate in the study area are part of the headwaters of the Missouri and Snake rivers.

The study area appears to have been affected primarily by the forces of nature, but some human influences have occurred. Some of these influences are substantially noticeable, and boundary adjustments were made to remove them, as discussed in Section I, "Size." These human activities have an influence beyond the specific area where they occur. However, boundary adjustments have been made only to the edge of the impact or closest legal description. No "zone of influence" or buffers were created around the impacts.

Within the acreage remaining in the study area, there are some human influences that are not substantially noticeable, nor do they create a significant influence on the apparent naturalness of the area. On the BLM and SEA lands there is approximately 20 miles of vehicle ways, some that once were constructed but are no longer used or maintained; others that never were constructed or maintained but were formerly used, as wheel tracks show. About 18 miles of fencing, primarily along the boundaries, and two Soil Conservation Service snow course sites for the measurement of snowpack are other minor human influences on public land. There are three spring developments on SEA land and one on BLM-managed public land, and several prospect pits that were excavated more than 20 years ago in a search for phosphate on Taylor Mountain and Sheep Mountain. Recreational use of the lakes, particulary Blair Lake, has caused soil compaction and erosion, vegetation loss, and litter. Similar human disturbances have affected the immediate vicinity of the Sheep Camp headquarters on Odell Creek.

The two RARE II areas contain 6 miles of vehicle ways. One way, which leads to the trenching exclusion in Rock Creek Basin, was constructed but has been closed and is not maintained. The other two are four-wheel drive trails.

On the Forest Service Centennial Mountain Land Use Plan Management Area 1, there are two abandoned cabins, an old coal mine and building, and an active slate claim on Tin Cup Creek. There are three spring developments and a log- and earth-filled dam on Aldous Lake, and the area contains five miles of fencing. Range reseeding was done on areas of 20 to 300 acres in the 1950s, and 300 acres of sagebrush was sprayed with chemicals on Big Table Mountain in 1978. There is visible evidence of the spraying in some areas. Timber

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was harvested in several parts of the southern boundary before 1950, but the influence of this activity is not readily apparent to the average visitor. Management Area 1 also contains about 26 miles of vehicle ways, of which half were neither constructed nor maintained.

III. Outstanding Opportunity for Solitude or a Primitive and Unconfined Type of Recreation

A. Solitude

The Centennial Mountains range encompasses an area that is 32 miles long and 6 miles wide at the widest points. Numerous drainages run north and south from the crest to the valleys. The foothills are predominantly open forests of mature Douglas-fir and lodgepole pine; they provide vegetative screening without a sense of confinement. Isolated meadows offer views up into the high country and over the valley floor below. Higher elevations within the area have more open vegetative communities. High-elevation meadows extend to the Continental Divide. The study area has four peaks above 9,000 feet in elevation.

The study area's size and its varied attractions make it possible for visitors to disperse throughout the area rather than concentrating in any one spot. The diversity of topography and vegetation in the study area allows visitors to be physically and visually separated from one another. Although steep rock faces restrict access and movement to some degree, the many drainages provide separation. Cross-country travel along the divide is relatively easy, and a large number of open meadows offers a variety of camping areas.

B. Primitive and Unconfined Recreation

The Centennial Mountains provide a variety of opportunities for primitive and unconfined recreation. Fishing is excellent for both native and nonnative species. During the winter months the ample snowpack gives visitors the opportunity to cross-country ski or to snowshoe. Limited winter access would restrict these activities to Odell Creek and the east and west ends of the study area. The scenic views offer many chances for photography and aesthetic enjoyment. Observation and photography of wildlife, geologic features, and wildflowers are other possible activities.

The physical characteristics of the area combine to offer outstanding opportunities for hiking, horseback riding, and camping. The topography of the foothills is gradual and rolling, providing a wide selection of travel routes into the high country. Walking and riding in the high country is not restricted by vegetation or topography.

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Hunting opportunities are outstanding. Excellent elk, moose, and deer habitat offer opportunities for hunting these big game species. The Forest Service estimates that 2,000 Idaho hunters were in the Centennial Mountain range during the five-day 1979 elk season.

The Centennial Mountains study area does offer a wide diversity of primitive and unconfined recreational activities and outstanding opportunities for hunting, fishing, hiking, horseback riding, and camping.

IV. Supplemental Values

In 1978 Congress called for the development of a National Continental Divide Trail. Approximately thirty-five miles of the Continental Divide traverse the study area. To comply with the Congressional mandate, a cooperative study was completed by the BLM and the Forest Service in 1979 to determine a trail route. Implementation of this proposal may begin by 1981.

Prehistoric people gathered rocks for use in weapons and tools in the study area. Historic use of the area has concentrated on ranching, with timber and mining as ancillary activities.

The Centennial Mountains have a prominent fault scarp that is exposed along the north face of the range. In some places this scarp gains more than 3,000 feet in elevation in one mile. Other cross faults divide the range along north-south lines.

Two threatened species of wildlife may occasionally use the Centennials. A reconnaissance inventory by the Interagency Grizzly Bear Study confirmed that the area is suitable grizzly habitat when considered as part of the Yellowstone ecosystem. Grizzly bears wander into the study area, but apparently do not remain. Occasional sightings of northern Rocky Mountain wolves have occurred in the study area. A 1978 Forest Service study indicated that the Centennial crest is unoccupied by wolves but suitable as wolf habitat. However, the area is not being given priority in the efforts of the Fish and Wildlife Service Northern Rocky Mountain Wolf Recovery Team.

The study area contains a large diversity of vegetative habitat types. During an inventory in 1979, 362 taxa of vascular plants were identified on BLM land and on the Sheep Experiment Station range. Annual precipitation of more than 30 inches on the crest contributes to beautiful displays of wildflowers every summer.

From the Continental Divide in the Centennials, a visitor can see the Tetons 75 miles to the southeast, the Lemhi Range 75 miles to the southwest, and the Madison Range, the Gravellys, and the Snowcrests to the north.

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As mentioned above, the variety of resources in the Centennials adds to the scientific, educational, and historic values found in the study area. A visitor's trip to the area would be enhanced by these supplemental values.

V. Possibility of Certain Areas Returning to a Natural Condition

Lands that have been excluded from further consideration in the study area were eliminated because the imprints of humans would require artificial rehabilitation and a long period of time to return them to a natural condition. There are other human influences that could be eliminated with hand labor and natural processes. This would benefit the apparent naturalness of the area. Primarily, this would include the vehicle ways that have been closed to further vehicular use by both the Forest Service and the Bureau of Land Management. The study area receives from 15 to 30 inches of precipitation a year; this should enable the vehicle ways to revegetate. There are sections where hand labor and reseeding might be needed to stop erosion.

VI. Preparers of the Wilderness Intensive Inventory

From Targhee National Forest:

John Mercer Philip Crissman

Intensive Inventory narrative for Centennial Mountain Land Use Plan Management Area 1.

J. Healy Clyde Maycock

RARE 11 4-962 Wilderness Attribute Rating System.

From Beaverhead National Forest:

Wayne Phillips Larry Lewis Virgil Lindsay

RARE II 4-962 Wilderness Attribute Rating System.

From the Bureau of Land Management:

John Augsburger Cynthia Copeland Richard Ward

Intensive inventory narrative for BLM and Science and Education Administration Sheep Experiment Station.

Cynthia Copeland

Wilderness intensive inventory summary.

2 pages missing

87T

United States Department of Agriculture
Forest Service
Targhee National Forest
P.O. Box 208
St. Anthony, ID 83445

1920

May 19, 1987

The Wilderness Society
Northern Rockies Regional Office
105 W. Main Street, Suite E.
Bozeman, MT 59715

Dear Mr. Lewis and Mr. Scott:

I have your request for information about the Centennial Mountains Wilderness Study Area. I'll respond to each item in the same order as your request.

1. I have included the WARS summary for the Targhee. However, only a portion of the present study area, Mt. Jefferson, was included in the evaluation phase of RARE II, so the WARS summary may not be relevant to the entire study area. Much of the Centennials was involved in two early "unit plans" at the time of RARE II, and initially the involved locations were excluded from RARE II. Later, near the end of the RARE II process, the entire area was included but the evaluations, etc., common to RARE II areas were not then performed or considered necessary since the wilderness study in conjunction with the BLM primitive area was planned.

2. I'm not aware of other RARE II information that would reflect the area's wilderness qualities.

3. We have no documentation on the ARS Sheep Station land's wilderness qualities, and are not aware of any assessment having been made. As you know, the Sheep Station lands were formerly administered by the BLM, are in Montana, and are not within the Targhee. My understanding is that language in the Interior and Related Agencies appropriations legislation prohibited such study while under B.L.M. jurisdiction, and the Agriculture and Food Act of 1981 placed these lands under the jurisdiction of the U.S. Sheep Experiment Station thereby excluding the lands from the current study.

4. The Targhee Land Management Plan treats the study area as a separate management area, and precludes timber harvest. We have no plans for scheduled or unscheduled sales, and have no expectation that such plans will be developed in the foreseeable future. Any such plans would require revision of the Targhee L.M.P.

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This may appear to be a contradiction as data for the "out-decades" in the LMP and FEIS identifies future harvest potential. For example, the table on page 264 of the LMP (copy included) reflects "timber harvested" (MMBF) of 2.5, 1.6, 3.5, and 2.6 per year for decades beginning in 1991. Those figures, however, are not a decision or a clearance to actually program such harvest and enter the area. Our position is that the language in the management direction - i.e., non-development management - is controlling, and barring revision of that direction, it will control in future decades as well. We consider this to be the case even if the wilderness study is then completed, and regardless of whether the recommendation is wilderness or non-wilderness.

To summarize, the out-decades' data is a reflection only of capability or potential and of actions that would be necessary to realize that potential. Actual programming of harvest, however, is governed by management direction in the LMP. For that reason, the DEIS for the wilderness study indicates that the wilderness alternative would not result in a timber opportunity foregone* or loss of output - our rationale being that the potential yield is already foregone as a result of LMP direction.

5. Since no timber harvest is planned in the area there is no assessment of harvest effects on other resources.

6. Parts of the area are used by grizzly bear occasionally. The eastern portion of the Targhee side of the area, 26,000 acres, is Situation II habitat as shown on the attached map. I've included "sighting reports" from 1965 to the present that will give you an idea of use by grizzly. I note that the most recent "Greater Yellowstone Report" (Spring 1987) contains on page 14 a map showing "density of sightings." You'll note the density drops off quickly as one moves west of Henry's Lake.

7. There are no plans for road construction or any Forest Service developments. However, the Forest LMP indicates that reconstruction of the existing East Dry Creek and Keg Springs Roads is needed to correct localized erosion and water problems associated with the present roads. These are low-use roads and the standard would be limited to that necessary to meet soil and water needs.

*On the Targhee portion.

87V

I appreciate your interest. If you have further questions, please let me know. I would be happy to meet with you at your convenience if a detailed discussion of the resources and management of the Targhee portion of the study area would be helpful.

Sincerely,

John E. Burns

JOHN E. BURNS
Forest Supervisor

Enclosure

88A

P.O. Box 1129, Bozeman, MT 59725

June 18, 1987

Mr. James Moorhouse
District Manager
BLM- Butte District
P.O. Box 3388
Butte, MT 59702

Dear Jim,

The Montana Eastside Forest Practices Committee would like to offer the following comments on the BLM - Centennial Mountains Wilderness Study DEIS. Please enter these comments in the formal record of hearing.

Our committee was organized to promote a common interest in multiple use management of public lands. A major goal of the committee is to maximize timber supply on a sustained yield basis, and to maintain the growth of healthy forests through sound silvicultural practices. Consistent with this goal we do not subscribe to setting aside our public land for single use purposes, such as wilderness. We oppose the selection of Alternative #1 as the proposed action. We strongly favor selection of Alternative #3, the NO WILDERNESS alternative for recommendation to the President.

The study area is broken up by at least six roads with some "jeep" trails bisecting the area, further, the study area necks down to less than ½ mile wide in several places. By your own study you have shown that the Centennial Mountains do not fill any unique niche in contributing to the diversity of the wilderness system. The landforms and ecotypes found in the study area are already adequately represented in the National Wilderness Preservation System.

Within the study area is 13,200 acres of suitable timberland with a standing volume of 128.5 million board feet. Ninety percent of the standing volume is in the mature sawtimber class and should be harvested. Given an annual growth rate of 43 cubic feet/acre/year the 13,200 acres can sustain an annual harvest of 2.64 million board.

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The growth on this timber is double that which is required to be classed as commercial timberland. The timber in the study area is tributary to mills in Dillon, Montana and St. Anthony and Rexburg Idaho. All three of these mills have a history of harvesting timber in the Centennial Mountains and it would be a distinct disadvantage to them to have this area set aside for wilderness designation.

M-24 The discussion in the DEIS of the impact on jobs of each of the alternatives needs to be expanded. You have not addressed in any way the cummulative effect on the affected communities of the planned reductions in timber harvest on both the BLM and forest service lands. Because of the major reductions in harvest hundreds of jobs will be lost in the near future as compared to the 18 potential jobs you say will be foregone under your proposed action.

We would like to see you expand you economic study to show the costs to the taxpayer of each of your alternatives. You have not shown any discussion of the cost to the federal government to designate and/or manage the proposed area for wilderness. Likewise there is no discussion of the potential loss to the federal treasury that will occur as a result of placing 10,200 acres of suitable timberland into wilderness. The economic study should also focus on the local communities and the effect of the proposed action on the local tax base. If a complete economic analysis is done we are confident that you will agree with our proposal for multiple use management for the entire study area.

We are aware of the naturally occurring erosion and sedimentation problems in the Centennials. We believe these can be corrected and water quality improved through multiple use management. It will be much easier to carry out soil stabilization projects if the area is not a wilderness. It is your responsibility as a public land manager to see that our soil is stable and our water quality is not degraded. Wilderness will not allow you to achieve this.

As you have had pointed out by other groups the Centennial Mountains are an important area for motorized recreation, especially snowmobiling. Motorized recreation is an important component of multiple use management as it affords millions of Americans the opportunity to enjoy their public lands in both summer and winter. We support motorized recreation for the Centennials and do not want to see these opportunities lost to wilderness.

We are concerned about the possible designation of parts of the study area as Areas of Critical Environmental Concern. We feel this designation would benefit only single use and would preclude multiple use management. Prior to designating any areas as ACEC we would like to be notified so we may comment on your decision.

88C

Page 3.

O-16 We support your decision not to include the Sheep Experiment Station lands and the First Continental Land Exchange lands in the study area. Neither of these lands exhibits wilderness qualities and have a great deal more value in terms of multiple use management.

We wish to reiterate our opposition to designating any of the study area wilderness. Under current management plans, even if the entire area is released to multiple use management, 82% will still remain roadless and be managed as such. With this type of management plan there is no need for wilderness. We support selection of Alternative #3, the NO WILDERNESS alternative for recommendation to the President.

Thank you for this opportunity to comment on the proposed management of our public lands.

Respectfully,

Mark A. Simonich

Mark A. Simonich
Secretary

MS:tk

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June 17, 1987

Centennial Mountains

Dear Sir.

There should be a law that Protects any National Park (or State), Wildlife Refuge or sanctuary from outside destruction of watershed, soil erosion etc. that would do harm to the above mentioned. This is what I would like to see happen with the Red Rock Lake Refuge. That is why is just a couple sentences that we need the Centennials Mountains in Wilderness. all 92,00 acres There was one Ranchers at the Dillon Meeting that was against Wilderness and of course he was a sheep rancher. I have talked to several Ranchers of the Centennial in the past and most of them didn't or want Wilderness but by the same token they didn't want

logging, mining either because of soil erosion filling their irrigation Canals etc But there are few ways to fully Protect the ranches in Refuges need except by Wilderness The soil on the hills of the Centennials is real susceptible to erosion if only slightly disturbed.

If the saw mill at Dillon thinks the need the little bit of timber they will harvest at the Base of the Centennials they are in trouble Anyway and should cut down their production instead of trying to increase because the Beaver head forest is only selling between 15-20 million a year the same amount the mill says they need plus a little more so instead of complaining they better look ahead and act accordly.

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They talk about multiple use well, what most People don't realize is that the only use that wilderness cut out is logging you know as well as I do that the mines in the Centennials are along with grazing can not be eliminated except for over grazing and with a lot of the sheep grazing area has been over grazed in the past just look around at the weeds in areas or there not much that will bring on weed much faster than over grazing.

The Ranchers that have reservoirs in the proposed area should have access to them by pickups etc for regulation or repairs also to deliver salt to their cows. That will do no damage.

also I believe the snow mobile trail should be left open.

89C The Refuge need this Buffer

you to ensure the survival of all the wildlife or plant species on the Refuge.

It really too bad that when our predecessors made it a refuge that they didn't stake in the Centennials. If our fathers hadn't of had a lot of foresight I don't think we would now have Yellowstone, Glacier, Yosemite and other Parks and Refuge.

It is said that those darn environmentalist don't give a darn for the people. Well it's just the opposite we want to save these areas for all future generations to enjoy ~~not just~~ like Yellowstone etc.

Sincerely,

Don R Stoecker

Pintler Audubon Adopt a Refuge Program

D.R. Stoecker
Georgetown Lake
Aneconda, MT 59711

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89E

Centennial Wilderness

J-5

This is a letter comment that I had not thought of at first until a friend mentioned it to me. This concerns the Lima Reservoir which is very critical ~~to~~ for the water supply of the ranchers for the irrigation of hay ground and other crops. Therefore any more disturbance of soil & that is more important to our economy than the our agricultural community which is a lot more important than the two million feet or so amount of timber that would be logged in the Centennials each year. The silt etc from logging operations could have a drastic effect on the water table of the reservoir especially in a dry year like this year. Any slowing down of the water moving through Red Rock lakes could have quite an effect on how fast the Reservoir would on a dry year like this.

I have heard that there is a horse logger in the area that would be will to log the area with no damage to the soil at all. But of course when this area becomes wilderness there will be no logging any way

Sincerely

Don R Stoecker

Pintler Audubon Adopt a Refuge Program Chairman

90A

June 11, 1987

NEVADA OUTDOOR RECREATION ASSOCIATION, INC.
NATIONAL PUBLIC LANDS TASK FORCE
SOUTHWEST WILDLANDS EDUCATIONAL INSTITUTE (NORA)
NORTHERN ROCKIES BLM TASK FORCE (NORA)
P.O. Box 1245
Carson City, Nevada
89702

Founded 1958
HONORARY LIFE MEMBERS

District Manager
Butte District Office
U.S. Bureau of Land Management
P.O. Box 3388
Butte, Montana 59702

Subject: Centennial Mountains Wilderness Study Area(WSA) testimony

Dear BLM District Manager:

We wish this statement to be included into the written/printed record of the final EIS(environmental impact statement) for the Centennial Mountains Wilderness.

Concerned Nevadans for wilderness on our Public Lands have heard much about this magnificent Rocky Mountain wildland which lies astride the Continental Divide--and forms the most distant headwaters of the Missouri River system. We want the record to show that this organization has explored key portions of the WSA over the last 20 years. In 1986, we horsebacked into both the Odell Creek and Roaring Canyon portions of the WSA.

We came away infuriated over the massive destruction wrought via overgrazing by sheep on the most critical watersheds of the area. Much of it has been denuded of most forage--and rivers, lakes, fisheries and wildlife are being grievously affected.

O-16

This organization wishes to note, for the record, the BLM's illegal attempt to ignore 16,650 acres under the jurisdiction of the USDA Science & Education Administration, which is used as a "sheep experiment station". After viewing the situation on the ground, we can only conclude that the time for overgrazing experimentation has come--for it to end. We see no purpose in having more destruction take place to the environment. The EIS must discuss this destruction and determine alternatives towards future improvement of the forage, etc., within the 16,650 acre inholdings. We note that the legislation authorizing the sheep station did not withdraw the two inholdings from the WSA--and therefore this proceeding must analyse all environmental impacts affecting lands within the WSA.

This organization supports the designation of 92,000 acres as wilderness. Targhee National Forest has not provided any tangible rationale for excluding 42,000-plus acres of primeval roadless lands that lie contiguous to the BLM's roadless lands north of the Continental Divide.

F-3

We have noted these key flaws in the draft EIS:

(1) The relationship between the WSA as a whole and the greater Yellowstone ecosystems is almost totally avoided in the EIS.
(2) The 16,650 acres of Sheep Station lands, consisting of key alpine and subalpine lands in the very heart of the Centennial Mountains--along the Continental Divide--are virtually ignored in the draft EIS because of solely political considerations.
(3) The lack of Targhee National Forest--where half the WSA is located--involvement due to preconcieved bias against wilderness. Records show that this was apparent even before the WSA process began.

(continued)

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Centennial Mountains WSA draft EIS/page two

Conflicts within the WSA are low. 6,500 acres currently under oil &gas lease will probably not be renewed. Phosphate leases within the WSA have not been viable--and the future for economic development is not apparent. Limestone exploitation has been almost negligible and does not affect the WSA's primitive recreational experience.

Only 13,200 acres is theoretically deemed suitable for timber production --in terrain much too steep and access to remote to make it profitable. There may be high timber values west of Matsingale Creek--but, this is in notoriously unreliable soils--which are unstable and the risk of increasing sedimentation quite noticable. The Red Rocks National Wildlife Refuge manager has already pointed to the Matsingale Creek situation as having the potential for "finishing off the refuge".

ORVs pose the most imminent threat along the northern front of the range. There are 600 RVDs per year according to BLM's own estimates. Both overuse a loop affecting the western approaches to Yellowstone as well as Odell Creek. The latter violates Section 603 interim management and protection into the BLM Primitive Area(WSA) and constitutes illegal trespass across John Taft's Centennial Ranch.

G-1 The west end of the WSA is critical habitat for elk. It is a migration route and staging area for and interstate herd believed to number 300 to 500 elk. The WSA is also vital to transplanted interstate moose population--from which two record bulls were taken during the last 5 years.

F-1 The WSA contains one of the lower 48 states few successful peregrine falcon hatching sites(in the wild), a population of great grey owls and other rare species. For instance, the upper Red Rocks drainage is habitat for one of two known remaining native populations of Arctic grayling in the lower 48 states.

The climate with the WSA and its surrounding region is cold and harsh, with no more than 10 frost-free days annually in the Centennial Mountains WSA. Air quality in the area is still near pristine--cited as one of the cleanest in the United States. The range rises to over 10,000 feet elevation. It's northern face and incised canyons possess some of the most spectacular Rocky Mountain features in this tri-state area. The Centennials are one of the few ranges in the western USA to trend east to west. This presents over the long term, unusual ecological and evolutionary scenarios.

Culturally, the range is believed to have archeological significance. There is evidence of paleo-Indian occupation going back possibly 14,000 years. 26 cultural resource sites are already known. These include one conical timber lodge, one rock ring, five stone quarry workshops, 17 lithic scatter sites--which makes the archeological potential in the WSA very high.

The average snowpack is 35 inches. Much of this snowmelt directly impacts the critical Red Rocks refuge--now a major habitat site for such near-extinct species as the whooping crane. Overgrazing is by far the most imminent danger to this and other wildlife habitats in the area.

F-4

Soils are mostly on the deep clay type--mixed with altered volcanics. Slump topography is widespread and prevalent; and it has a high moisture content. On the steeper slopes erosion has been accelerated by overgrazing sheep--and the known hazard is already rated high. The one time grassland ecology in the area is changing. Encroachment by conifers and exotics is now occurring because of abusive overgrazing. There are already many rock faces that are devoid of vegetation. Key riparian communities overlap on and off both BLM and USFS lands within the WSA. The latter cannot be targeted by land use planning via an inter-agency piecemeal basis. They must be managed as a unit.

Of especial importance is the Centennial Mountains WSA's designation as a

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"situation 2" grizzly bear habitat. Studies show that it(the WSA) should be considered part of the Yellowstone population. Some 26,000 acres of the WSA is considered outstanding grizzly potential habitat.

In essence, the Centennial Mountains WSA is a major constituent of the northern Rock Mountains province. It has three major ecosystems that are deemed highly fragile: Douglas-fir forest, western spruce-fir forest and and critical high alpine meadows.

The 92000 acre size of the WSA involving BLM, Beaverhead NF, Targhee NF and the AGF far exceeds the minimum 5,000 acre requirement set by FLPMA and the 1964 Wilderness Act. The naturalness of the WSA is highly unique (especially for BLM), with its rugged peaks, precipitous cliffs, jewel-like lakes, alpine ecology and exceptional scenic qualities. It affords one of the northern Rockies outstanding opportunities for wilderness solitude. Forty-eight drainages dissect the WSA and elevations vary from 7,000 feet to over 10,000 feet. This is diverse topography and possesses associated vegetative screening of such high quality--that it assures any visitor a thorough wilderness and solitude experience.

As a site for outstanding primitive recreation--the WSA is renowned. Local ranches consider it unparalelled in affording opportunities for hunting, fishing, horseback riding and backpacking. The WSA is highly prized by sportsmen for its elk, moose and black bear. From the heights are seen awesome vistas of the Tetons and other snowy summits of the Great Divide.

The WSA possesses unique supplementary values. This includes a portion of Continental Divide National Scenic Trail--which runs the entire length of the WSA. A pronounced fault scarp exposes precipitous relief on the north side. In places, the north face of the range rises a sheer 3000 feet. This is the most distant source of the 4,000 mile long Missouri River system from its mouth--and it is the headwaters for Hellroaring Creek.

The 92,000 acre boundary rationale assures protection for this vital Yellowstone ecological complex. It would extend added protective impacts for the critical Red Rocks refuge. Failure to protect the pristine conditions within the WSA area will lead to mounting problems for wildlife, fisheries and man-related activities. The BLM and other Federal agencies involved simply cannot justify the present 26,248 acre recommendation, except on spurious political grounds. Failure to assess these additional wildlands violates the mandate of FLPMA Section 603, the 1964 Wilderness Act, NEPA and the Endangered Species Act(plus other laws). We trust the agencies involved will rethink their true responsibilities and professionally do their duty in regard to the overall WSA.

Respectfully submitted,

Charlie Watson Jr.

Charles S. Watson, Jr.
co-founder and Director

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Greater Yellowstone Coalition

COMMENTS
Submitted to the
Bureau of Land Management

on the

DRAFT CENTENNIAL MOUNTAINS WILDERNESS STUDY/
ENVIRONMENTAL IMPACT STATEMENT

by the

Greater Yellowstone Coalition
Box 1874
Bozeman, MT 59715

June 19, 1987

Louisa Willcox,
Program Director

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GREATER YELLOWSTONE COALITION: COMMITMENT TO PROTECTING THE CENTENNIALS

The Greater Yellowstone Coalition hereby submits the following comments on the Centennial Mountains Wilderness Study / Environmental Impact Statement (EIS). The Greater Yellowstone Coalition (GYC) is a Bozeman-based conservation organization with a membership of over 1300 individuals and 50 local, regional and national organizations committed to preserving the integrity of the Greater Yellowstone Ecosystem. Coalition members regularly enjoy the outstanding wildlife, scenery and recreational opportunities provided by the Centennial Mountains. The membership also includes holders of special use permits on the forest and adjacent BLM lands, and landowners with private holdings adjacent to the Centennials, who are therefore affected by any forest or BLM management decision. The membership also includes noted scientists who have and continue to conduct research on the Centennials and adjacent lands on topics of critical concern to the protection of this important component of the Greater Yellowstone Ecosystem.

GYC's long-term interest in the area is exemplified by an extensive analysis of Centennials ecology and management, conducted in 1986 by approximately 15 scientists from a wide range of disciplines. The project report, "A Model for Information Integration and Management for the Centennial Ecosystem," (hereafter "GYC Report") was published by the Greater Yellowstone Coalition in June, 1986. Focusing on the Centennials Mountains and Valley, these scientists sought to develop a model to describe ecosystems in a way that would aid in ecosystem management of Greater Yellowstone. The report is attached, and the report and findings are hereby incorporated in these comments.

In addition, Centennials Ecosystem Project Leader Cliff Montagne recently completed a separate report, "Erosion Potentials in Centennials Mountains, Southwestern Montana," which addresses in detail some of the soils issues raised in the GYC Report. This report, completed in May, 1987, is also attached, and incorporated in these comments. The findings and recommendations of both reports form the basis of some of GYC's comments on the Centennials EIS.

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I. Introduction and Summary: General Remarks

The Centennials EIS offers an important and timely opportunity to review the wilderness potential of this outstanding area. GYC appreciates the opportunity to comment on the Draft EIS which is exceedingly clear, concise and readable.

It is our opinion, however, that the Draft EIS reflects only a partial understanding of the ecological underpinnings and the importance of the Centennial Mountains Wilderness Study Area (CMWSA) in the Greater Yellowstone Ecosystem. Furthermore, the management recommendations fall far short of the action necessary for the long term protection of this Ecosystem. GYC opposes the adoption of the preferred alternative (Alternative 1) and recommends that a new plan be developed and adopted. This new plan should:

(1) Recommend a 92,000 acre Centennials Mountains Wilderness on both sides of the Continental Divide;

(2) Provide stringent protection of the Centennials' water quality which is essential to the survival of arctic grayling, trout and trumpeter swans, as well as other waterfowl and wildlife;

(3) Thoroughly evaluate the cumulative impacts of development on wildlife, recreation and scenic values;

(4) Reduce timber harvest and road building programs, restrict oil and gas leasing and mining, and limit ORV and snowmobile use in order to ensure the protection of the above resources. Specifically, all large-scale timber harvest, road building, oil and gas leasing and motorized vehicle use should be prohibited in the 92,000 acres in the "Ecosystem Alternative" which includes:

a) areas considered essential for the survival of threatened and endangered species, including grizzlies, eagles, peregrines and wolves;
b) ungulate calving grounds, migration routes, feeding areas, and other areas considered essential for the long-term survival of ungulates;
c) habitat essential for Management Indicator Species and Species of Special Concern;
d) soils and slopes with high erosion and landslide potential, as identified by Montagne in attached report;

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e) candidate and proposed Montana Natural Areas, under consideration by the Montana Natural Heritage Program.

(5) Take affirmative action to identify and restore wildlife habitat which has been damaged by past development practices;

(6) Develop and implement on-the-ground monitoring programs for flora and fauna, water quality and recreation, in order to ensure the long term maintenance of biological diversity in this portion of the Greater Yellowstone Ecosystem, and the recreation and wildlife opportunities that depend on them. (Since the GYC Report discusses monitoring programs for each resource in detail (p. 149-166), they will not be duplicated in these comments.)

(7) Improve coordination among adjacent agencies in the Greater Yellowstone Ecosystem for the purpose of protecting critical wildlife species, recreational opportunities, scenic vistas, and natural ecological processes such as fire;

(8) Convert the present administrative withdrawal of the Sheep Station to a more permanent statutory withdrawal as a condition to including the Sheep Station inside the Wilderness boundary;

(9) Provide for federal acquisition of all non-federal lands within the exterior boundaries of the recommended Wilderness through land exchange, with subsequent automatic inclusion of acquired lands within the Wilderness.

The comments which follow will discuss these recommendations in detail.

II. Greater Yellowstone Ecosystem

The Greater Yellowstone region encompasses one of the largest essentially intact ecosystems remaining in the temperate zones of the earth. Its spectacular mountain landscape, steamy geysers and fumaroles, and magnificent wildlife have long inspired the admiration and awe of the people of the United States, and indeed the world. The rivers that spring from its mountain recesses flow into the three major drainage systems of the nation: the Snake-Columbia, Green-Colorado and Yellowstone-Missouri. It is no accident that the Greater Yellowstone Ecosystem boast the

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world's first National Park, the nation's first National Forest, the largest elk and bighorn sheep herds in the lower 48, the last refuge of the endangered black-footed ferret, the last free-roaming bison herd, the largest and last remaining undisturbed geothermal region in the world, and one of the last places in the continental U.S. where people can still see the grizzly, the Great Bear.

Yet the Yellowstone Ecosystem today faces a vast array of threats to its health from logging and road building to oil and gas, and mining and geothermal development. Taken individually each threat might be tolerated and its effects mitigated. Taken together, however, the cumulative impacts of these threats are capable of degrading Greater Yellowstone to a point from which it could never recover.

The Greater Yellowstone Ecosystem consists of Yellowstone National Park and Grand Teton National Park; The J.D. Rockefeller Memorial Parkway; Red Rock Lakes National Wildlife Refuge, Gray's Lake Wildlife Refuge and the National Elk Refuge; private lands; Bureau of Land Management lands; the Wind River Indian Reservation; parts of sixteen counties in the three states of Idaho, Wyoming and Montana; and all or part of the Gallatin, Custer, Shoshone, Bridger-Teton, Targhee, Beaverhead and Caribou National Forests.

Each management agency has its own mission, history, and personality. Yet, despite some localized examples of ecologically sensitive management practices, some of these agencies are not committed to sound stewardship of the natural resources of Greater Yellowstone. Also, the differences between administrative priorities and practices creates serious adverse impacts on wildlife, recreation and scenic resources. For example, on highly productive forest lands adjacent to Park lands, where recreation and wildlife are emphasized, critical habitat for free-roaming wildlife species can be fragmented and recreational experiences diminished through intensive timber harvest and road building.

From an ecosystem-wide perspective, these inconsistencies and lack of a central vision based on the principles of wise stewardship have and continue to result in habitat destruction and fragmentation of the Ecosystem in a way that is incompatible with the long term protection of its flora and biological diversity, and the maintenance of its ecological integrity. If current trends continue, the

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Greater Yellowstone faces at best an uncertain future. At worst it may cease to function as a viable ecosystem.

Already the tell-tale signs of ecosystem erosion can be detected from declining populations of sensitive species such as grizzlies, trumpeter swans, lynx and wolverines. Aggressive action is needed to stop the deterioration of essential habitat, and the shrinking of populations of sensitive plants and animals, which reflects an overall narrowing in the genetic base necessary for adaptation to changing conditions. The time is short to steer Greater Yellowstone away from its present march toward large-scale extinction and ecological collapse.

1. Understanding Biological Diversity

Understanding biological diversity is essential to recognizing the critical role played by the Centennial Mountains in the Greater Yellowstone Ecosystem. The DEIS applies an incomplete and inadequate definition of biological diversity, exemplified by such statements as, "although adjacent to the Yellowstone area, the Centennial Study Area does not add to the diversity of that Ecosystem. The ecosystems which make up the Centennials are represented elsewhere in the Yellowstone area," (DEIS, p. 42). This definition wrongly assumes that ecosystem diversity is the only type of diversity that exists or is important. GYC recommends that the BLM correct this error in the revised EIS to reflect the complete and correct definition of diversity given below.

Biological diversity refers to the variety and variability among living organisms and the ecological complexes in which they occur (OTA, 1986). Thus, biological diversity includes ecosystem diversity, as well as species diversity and the genetic diversity within species. Species diversity is measured by the number of species within a given area. Genetic diversity represents the genetic variation within a species.

The earth's biological diversity is being reduced at an increasing rate, principally due to the increasing conversion of natural ecosystems to human modified landscapes. Although the loss is particularly acute in the tropics, it is occurring in most regions of the world, including western North America. Most scientists working in this area believe that the problem has reached crisis proportions (Wilcove and Wilcox, 1986).

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Increasingly, natural ecosystems in the U.S. and around the world are being reduced to small islands surrounded by development. Habitat fragmentation and destruction combine to reduce and isolate flora and faunal populations to the point where they are no longer large enough or genetically diverse enough to survive. The key to protecting long-term species and genetic diversity is the preservation of habitats of adequate size and character for the maintenance of species and populations.

Although it is true that the Centennials may not be important to protecting ecosystem diversity, as respresented by the Douglas fir, Spruce/fir, and Alpine Meadows and Barren habitat types, since these are found elsewhere in the Greater Yellowstone Ecosystem, it is incorrect to assume that the Centennials is not important to species or genetic diversity in Greater Yellowstone. In fact, from the standpoint of species viability, the Centennials is a integral part of this larger ecosystem. Given the rarity, sensitivity, and large habitat requirements, of such species as grizzlies, bald eagles and goshawks, the Centennials could be absolutely essential to long-term maintenance of species and genetic diversity. With substantial human development, as proposed in the Centennials EIS, ecosystem diversity might still remain high, but species and genetic diversity could drop to the point where extinctions accelerate, and the system steadily simplifies and collapses.

Therefore, it is insufficient and incorrect to consider only the impacts on ecosystem diversity, as described in the DEIS. BLM should correct this deficiency by assessing the impacts of proposed actions on species and genetic diversity as well. Such analysis will most likely demonstrate that preserving the entire 92,000 acre area will be required to protect biological diversity, according to the complete definition of the term.

2. Extinction Trends in Western U.S. Ecosystems: Implications for Greater Yellowstone

With the slow and steady erosion of essential habitat, that mark the last 100 years, the extinction rates of mammals in western U.S. national parks have been accelerating. In a 1986 Ph.D. thesis written by William Newmark on the historic disappearance and immigration of mammal species in 14 western parks, extinctions have been correlated with the size of the reserve: the larger the protected area, the fewer the extinctions. The results of the study are alarming. Since

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establishment, for example, Mount Raineir National Park has lost 28% of its major mammalian species; Yosemite, 31%; Bryce, 38%; Lassen, 42%. But in Yellowstone, 5 times the size of Yosemite and 10 times the size of Rainier, only the gray wolf is known to be extinct -- and only after years of aggressive predator control measures.

These extinctions are occurring at rates far above "natural" levels, and are due to two major factors, the size of the area originally protected park is often too small to ensure the maintenance of species and genetic diversity; and 2) the management of the park and/or surrounding natural area allows excessive and incompatible human development that changes vegetation, separates cross-breeding populations, and limits access to important habitat types.

The principles of island biogeography are useful to explain and model the processes of accelerated species turnover on islands and on terrestrial reserves. The population dynamics of flora and fauna in national parks parallel those on land-bridge islands, islands that originally were connected to a mainland before a rising sea gradually cut them off. In U.S. national parks, the sea is one of human development that can surround and separate the park from once-contiguous habitats. The theory of island biogeography explains accelerated extinctions and collapse associated with "islandification" as the result of habitat reduction and fragmentation. Eventually, the island ecology reaches a new equilibrium with fewer species. The actual number is determined largely by the size of the remaining piece: the larger the island, the more species will remain.

There is currently no doubt that Greater Yellowstone is becoming a natural island surrounded by a sea of human development. Although only one species has been lost from the Ecosystem so far, the risk of more extinctions in the near future is high. The status of many major predators, which play a critical role in regulating ecological processes, is precarious at best. Species such as grizzlies, mountain lion, wolverine, and lynx require large habitats of a particular character and spatial mix that are becoming more scarcer as development continues. Should these major predators become extinct, many more species can be expected soon to follow.

Greater Yellowstone, then, is at a critical juncture: opportunity presently exists to prevent the kind of ecological collapse that has occurred in other western

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reserves in the U.S. But this requires each management agency in the Ecosystem to understand the linkages between habitat and wildlife populations within the system, and to aggressively act to limit further habitat fragmentation and destruction. Because of the pristine character of the Centennials, the BLM and U.S. Forest Service, and Agricultural Research Service have an ideal opportunity to contribute to this effort of ecosystem protection.

The only way to ensure maximum protection of the entire species complex, present and potential, and this portion of the Greater Yellowstone Ecosystem is to award all 92,000 remaining roadless acres in the Centennials protection under a wilderness recommendations.

V. Importance of the Centennials in the Greater Yellowstone Ecosystem

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The Centennials play a critical role in maintaining the health and viability of the Greater Yellowstone Ecosystem. Although ecosystem dynamics in Greater Yellowstone are not yet thoroughly understood, it is recognized that the Centennial mountains and adjacent lands offer the appropriate mix of habitat and wilderness character necessary to sustain a tremendous diversity of flora and fauna, including a number of rare, threatened, endangered and sensitive species. This diversity is due in part to the wide range of micro-environments that result from elevational, climatic and topographic variation, as well as the presence of a number of different soil parent materials (GYC Rpt., p. 86). This factor, combined with the location of the Centennial Mountains between the Snake River and Centennial valleys, and between the Selway-Bitterroot Ecosystem and Yellowstone, contribute to a level of diversity that is far greater than much of the Greater Yellowstone Ecosystem.

Lying adjacent to Red Rocks Lake National Wildlife Refuge, one of richest waterfowl nesting, staging and migration areas in the region, the Centennials provide important habitat for many of the 255 species of birds that use the Refuge. And, in an Ecosystem that is almost entirely cut off from surrounding functional ecosystems, the Centennials provide the only remaining natural piece of land that links Greater Yellowstone with the Selway-Bitterroot Ecosystem in Idaho. This natural land bridge is believed by John Craighead and others to be the only potential route for natural passage of grizzly bears and

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wolves between an adjacent and intact ecosystem and Yellowstone.

Currently, there is substantial concern that the grizzly bear population in Yellowstone may have been reduced to the point that it is no longer viable without the reintroduction of individuals from outside the Ecosystem. If the last natural link provided by the Centennials is lost as a result of continued human development, so is all hope of natural restoration through migration of grizzly bears and wolves in Greater Yellowstone. In addition, other reduced populations of such species as wolverines and mountain lion would not be enriched as a result of development blocking immigration of additional individuals.

IV. Detailed Comments and Recommendations on Centennials EIS

A. WILDERNESS SUITABILITY

The entire 92,000 acre "Ecosystem Alternative" (see Appendix 3) fully meets the wilderness suitability requirements under the Wilderness Act of 1964. Therefore, the revised EIS should consider and adopt this as the preferred alternative.

(1) Size: The approximate 92,000 acre area in the "Ecosystem Alternative" includes BLM lands (about 29,000 acres); Beaverhead Forest lands (4,474 acres); Targhee Forest lands (about 42,040 acres); ARS Sheep Station lands (16,650 acres); and about 1,900 acres of State of Montana lands. The large size of this 35-mile long stretch of the Great Divide far exceeds the minimum 5,000 acre guideline for wilderness size set forth in the Wilderness Act.

(2) Naturalness: North of the Divide, the land consists mostly of rugged peaks and cliffs with very little evidence of human activity. The country south of the Divide remains predominantly natural although past mining, grazing and timber harvest have caused some site-specific impacts. The most significant intrusion is caused by the phosphate mining and associated low standard roads in the Taylor Peak area.

(3) Solitude: The WSA offers outstanding opportunities for solitude. The 35-mile upthrust of the Centennials varies from two to sight miles in width. Forty-eight drainages dissect the study area and elevations vary from 7,000 to 10,000 feet. This diverse topography and associated vegetative screening assures the wilderness visitor a good

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chance of avoiding encounters with others throughout most of the area.

(4) Primitive Recreation: The physical characteristics of the Centennials provide unparalled opportunities for quality hunting, fishing, camping, horseback riding, and backpacking. Most of the use is associated with elk, moose and black bear hunting in the fall. Extensive wildflower displays attract visitors in the spring and early summer. Spectacular views from the top of the Divide and peaks open out to the Grand Tetons 75 miles away.

B. BIOLOGICAL DIVERSITY: FLORA AND FAUNA

The diverse wildlife and fisheries of Greater Yellowstone are highest among public concerns about the future of the Ecosystem. And, because of particular temporal and spatial habitat requirements of rare and sensitive species such as grizzlies, elk, and cutthroat trout, the wildlife of Greater Yellowstone offers perhaps the ultimate measure of the integrity of the Ecosystem.

Since agency boundaries do not limit the ranges of wildlife, responsible management of the public lands of the Greater Yellowstone Ecosystem requires detailed species-specific knowledge of animal range, behavior, food habits and other ecological considerations. Interagency coordination and commitment to the survival of species indigenous to the Ecosystem is essential in order to prevent further degradation of habitat and loss of species.

H-2 In general, the Centennial Wilderness Study fails to provide essential information necessary to evaluate effects of the preferred alternative on wildlife and biological diversity. The Plan's treatment of habitat conditions, monitoring and management standards for wildlife is particularly poor. Therefore, the EIS is inadequate to assure the public that wildlife and fisheries will be maintained under the proposed Plan.

Furthermore, the document contains serious interjurisdictional inconsistencies which are inexplicable on biological and geographical grounds, and may in fact, result in irreparable harm to sensitive species. Most poignant of these inconsistencies are the absence of any wilderness recommendations on the Targhee Forest while the adjacent and ecologically similar Beaverhead Forest recommended some lands as wilderness, and the exemption of the Sheep Experiment

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Station, in the heart of the CMWSA, from wilderness review. The discrepancies in wilderness recommendations appear to conform with agency priorities rather than biological and geographical reality, and demonstrate that coordination is generally lacking between agencies.

F-9 In addition, the DEIS shows little analysis of cumulative impacts of the implementation of the plan on wildlife and fisheries. A display of information about how and where habitat has been and will be lost and fragmented is critical to understanding what will happen to species over time under the proposed management direction. It is also essential to assessing the long-term viability of populations in the CMWSA. The Plan, however, thoroughly fails to discuss its progress in the only cumulative effects analysis now occurring in the Ecosystem -- the Grizzly Bear Cumulative Effects Analysis Model. The Plan should be revised to assess the progress of the Beaverhead and Targhee forests in implementing this model, and to expand this approach to all endangered and sensitive species, Management Indicator Species, and Species of Special Concern. Information on developing and applying practical, simple and effective cumulative effects analyses is available both within the Forest Service, Park Service and state game agencies, and among conservation biologists in the academic community. The Coalition is eager to participate in this process, if desired.

Furthermore, the DEIS fails to assess how the Plan will affect the long-term viability of populations and species. Will the preferred alternative reduce any of the species or populations to the point where they are no longer viable? Are any of the populations already below the minimum level of viability, and if so, how will the Plan remedy this problem? The DEIS entirely fails to address such critical questions, which lie at the heart of protecting the diversity of flora and fauna that constitute the Greater Yellowstone Ecosystem.
I-1 In fact, if implemented, the Plan, could actually endanger or threaten certain populations such as the sensitive trumpeter swan, arctic grayling or cutthroat trout, as the result of development action that seriously degrades important habitat.

H-3 One of the most glaring deficiencies of the Plan is its complete lack of a coherent monitoring and enforcement program designed to ensure the protection of species and habitat. How will agencies know if standards such as water quality are being exceeded, or if declines in arctic grayling spawning success result from erosion due to sheep grazing? A

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carefully planned monitoring program is the only way to recognize ecological problems before they develop into crises, and to make necessary and timely management corrections. Without such programs, accompanied by stringent enforcement requirements, this DEIS is worth little more than the paper it is written on.

These deficiencies must be corrected in the revised EIS. Specific topics related to biological diversity will be discussed in the following sections.

ENDANGERED SPECIES

F-2 A. Grizzly Bears: 1. The DEIS fails to recognize the essential connection between grizzly bears in the Centennials and the rest of the Greater Yellowstone Ecosystem.

Although recognizing that the Centennial Study Area itself does not support a discrete population of grizzlies, the DEIS does note that the IGBST judged the area to be suitable grizzly bear habitat when considered as part of the Yellowstone population (DEIS p. 38). However, the DEIS failed to adequately consider the grizzly bear habitat in this context, or to take necessary measures to protect this habitat for current and potentially expanding grizzly bear use.

The DEIS notes that grizzly bears do use the study area. Specifically, the DEIS identifies 23,000 acres of Management Situation 2 (MS 2) grizzly bear habitat in Idaho, and 25,526 acres in Montana. In addition, the document identifies 30,000 acres of potential habitat in Montana. Additional information about grizzly bear sitings is provided in the GYC Report, Table 3. Besides the current bear activity in the CMWSA, noted grizzly bear scientists, including Frank Craighead, place great importance on the Centennials as ideal habitat for grizzlies dispersing from Yellowstone. Climatic conditions, such as drought, the loss of available quality habitat as a result of development elsewhere, and/or an expanding population could make the Centennials a key refuge for grizzly bears at certain times.

The Preferred Alternative and DEIS should be revised to recognize and protect the important ecological link between the Centennials and the Greater Yellowstone Ecosystem for grizzlies, and all other species discussed in these comments.

2. The Plan fails to provide adequate protection of

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critical grizzly bear habitat, as required under the Endangered Species Act, the Grizzly Bear Recovery Plan, and the Interagency Grizzly Bear Guidelines.

The mandate and specific management requirements for the threatened grizzly population in the Greater Yellowstone Ecosystem is well established.

The 1973 Endangered Species (ESA), as amended, states [PL 93-205, Sec. 7(a) (2)]: "each federal agency shall, in consultation with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered species or threatened species, or result in the destruction or adverse modification of habitat of species which is determined by the Secretary to be critical..."

In 1979, the US Forest Service adopted a detailed plan to conserve the threatened grizzly bear, and meet the requirements of the Endangered Species Act. This plan is set forth in the "Guidelines for Management Involving Grizzly Bears in the Greater Yellowstone Area," (hereafter, "Guidelines"). The Guidelines define Management Situation I and II areas as containing "habitat components needed for the survival and recovery of the species or a segment of its populations," (Guidelines, p 3).

Grizzly bears survive on approximately 1% of their historic range in the continental United States. The estimated 183 to 207 grizzlies living in the Greater Yellowstone represent one of perhaps three viable populations remaining in the lower 48 states. Servheen (1986) estimates that the grizzly population in the Yellowstone Ecosystem is currently declining at the rate of 1-2% per year. Knight and Eberhardt (1985) project a continued long term decline in approximate accord with the trend of the female population index. The Knight and Eberhardt Study concludes that the difference between stable or increasing grizzly numbers any downward population trend may be one or two additional female mortalities per year.

In 1975, the US Fish and Wildlife Service listed grizzlies in the lower 48 states as a "threatened" species under the Endangered Species Act, (16 U.S.C. SS 1531-1543) ESA. The ESA intends to "provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, [and] to provide a program for the conservation of such endangered species and

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threatened species (Id. at SS 1531 (b)). The ESA directs that "all federal departments and agencies shall seek to conserve listed species." (Id. at SS 1531 (c), see also SS 1531 (a)(1)). "Conserve" is defined in part as "the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this chapter are no longer necessary." (Id. at SS 1532 (3)).

The Grizzly Bear Recovery Plan emphasizes the importance of the management direction set forth in the Endangered Species Act and in the Guidelines. The Recovery Plan lists the application of the Guidelines directions on grazing, mineral development, timber and recreational uses of federal lands as Priority 1 Recovery Tasks (Recovery Plan, p. 122-123). Priority 1 Tasks are "those actions absolutely necessary to prevent extinction of the species" (Id. at page 117). In light of the Recovery Plan, failure to fully implement the Guidelines in wilderness plans would not only violate the Endangered Species Act's mandate to conserve the grizzly, it would also jeopardize the bear's continued existence.

It is well documented that one more of the following conditions will decrease the quality of grizzly bear habitat, which will in turn hinder the recovery of the population (Reid, 1986):

1. Degrading quality of ungulate habitat, especially critical ungulate winter range, spring migration (transitional) habitats, and to a lesser degree, elk rutting habitats.

2. Displacing a preferred later stage of forest succession with an unpreferred earlier phase of succession.

3. Increasing open road density in preferred ungulate and grizzly habitats.

4. Failure to adequately remove road beds in preferred grizzly habitat, or to plant those road beds with foods utilized by grizzlies.

5. Permitting high densities of people and intensive human activities in preferred grizzly habitat.

6. Improving grizzly habitat near private inholdings or popular human destinations such as campgrounds.

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7. Removing security cover and or important components such as denning or thermal (bedding) cover.

A number of these conditions have existed in the past and will continue to occur in the CMWSA if the draft Plan is implemented as written. In particular, the Plan will result in deterioration of critical ungulate habitat and removal of preferred grizzly forage and cover as a result of road building and logging. In addition, increased access and failure to enforce road closures will allow illegal mortality to continue in excess of the acceptable level set by the IGBST. These deficiencies must be corrected in the revised EIS, in order to comply with the ESA, the Guidelines, and the Grizzly Bear Recovery Plan.

2a. DEIS failed to consider or mitigate impacts of proposed actions on grizzly bears in the Targhee National Forest, identified in the Plan as MS 2 habitat.

If the Preferred Alternative is implemented, the impacts on grizzly bears in the Targhee could be serious and irreversible. First the Plan projects additional road milage on the Centennial portion of the Targhee in the next 50 years. Roads and access have been documented to be detrimental to grizzlies (CRS,p.70). Although the Targhee Plan relies on road closures subsequent to timber harvest, a recent study on the Flathead National Forest confirms that the Forest Service largely fails to successfully implement such closures (Hamer, 1986).

In addition, the Targhee National Forest Plan projects substantial additional acres of timber, particularly Douglas fir, to be harvested in the out years of the Forest Plan (see p.   of this report). Nowhere in the Targhee Forest Plan or in the Centennials DEIS is there an assessment of how this vegetational change created by logging would affect the continued survival of grizzly bears. This serious omission must be corrected in the revised EIS. Furthermore, the BLM must show that proposed actions will not harm grizzlies, or it should not permit these activities to occur.

2b. The DEIS failed to consider or mitigate impacts of activities on the Sheep Experiment Station on grizzly bears.

None of the past, present or proposed activities of the Sheep Experiment Station were discussed in the EIS, contrary to the full disclosure requirements of NEPA.

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These activities could be significant, in preventing successful recovery of the Greater Yellowstone grizzly bear population. By permitting the killing of black bears observed killing sheep, the Agricultural Research Service will facilitate the taking of mistakenly identified grizzly bears. And, the Sheep Station's use of herbicides and fertilizers could cause secondary harm to grizzlies, either directly or indirectly through or reduction of important forage plants. Furthermore, increased access and human use of the Sheep Experiment Station could increase the mortality risk to grizzlies.

Although none of these activities where included in the analysis in the DEIS, it is interesting to note that the BLM has recognized problems with Sheep Station activities related to grizzlies in the past. In 1978, BLM stated: "it is highly probable that habitat in the Centennials would be more suitable for permanent grizzly and wolf use if habitat conflicts such as indiscriminate vehicle use and other conflicts were eliminated," and that "observations collected to date strongly suggest the area would be permanently occupied if security and freedom from disturbance and predator control were provided." (Olsen, 1987). In addition, in Appendix D of the DEIS (p. 106), the BLM states that: "current resource abuse and degradation on the Sheep Experiment Station will clearly affect habitat quality for grizzly bears. The very best primitive resource values in the Centennial Mountains are contained in the Sheep Experiment Station. Past resource abuses from ORV use on these lands have highlighted the Station's inability to prevent resource degradation. In fact, the Station is not equipped with management authority or expertise needed to cope with recreation, wildlife or other management functions which are essential for the maintenance of the areas unique values." These insights should be incorporated in the expanded analysis of grizzly bear impacts in the revised EIS.

2c. The DEIS fails to ensure adequate interim protection of important grizzly habitat prior to completion of a cumulative effects model.

Protection of the grizzly bear habitat in the CMWSA requires understanding the complex relationships between the grizzly and its wide range of habitat requirements. In its decision to develop a cumulative effects model, the Forest Service has identified a critical need to display tradeoffs between grizzly protection and other uses of the forest.

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However, the model is not yet ready for widespread use. Therefore, the USFWS has developed guidelines for interim management for areas of competing use by grizzly and humans, such as proposed timber sales in Situation 1 and 2 grizzly habitat.

GYC is gravely concerned about the inadequacy of the DEIS in its evaluation of cumulative effects on grizzlies. In fact, the document entirely lacked any specific identification or analysis of cumulative effects on grizzlies. There is no evidence that the USFWS guidelines of interim management were used.

The DEIS must be revised for clear specification of a clear and enforceable interim plan, showing how the protection of grizzly habitat and populations will be ensured between now and the time the cumulative effects model is operative. Specifically, management should take into account the cumulative effects of open road densities on the forest and adjacent BLM lands in the CMWSA and surrounding areas. In evaluating habitat quality, it should distinguish between logged and unlogged habitat conditions, subtract from available bear habitat displacement corridors contiguous to road systems, and ensure the required acreage and distribution of security areas are provided. It should include a clear display of trade-offs involved in intensive timber management, road building, and other resource uses in MS 2 habitat. Furthermore, it should not preclude any future management options which could be indicated in later analysis using the cumulative effects model. In sum, interim management should be based on the principle of preventing irreversible harm to grizzly habitat.

F-6 B. BALD EAGLE

1. The DEIS fails to adequately consider and minimize the impacts of the proposed Plan on bald eagles, as required by ESA.

There is no doubt that bald eagles use the CMWSA. In fact, two pairs have nested successfully in the east end of the Centennial Valley; one pair has fledged two young on most years since counting began in 1978, and the other nest identified in 1983 fledged two young in 1983 (GYC Report, page 96). In addition, according to Greater Yellowstone Working Group member Al Harmata, "We have shown a link, through band recoveries and siting of color-marked birds, among habitats in the CMWSA and other areas in the Greater

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F-6 cont.

Yellowstone Ecosystem which may be essential for the survival of the non-breeding segment of the Greater Yellowstone Ecosystem bald eagle population. Continued degradation of habitat within the CMWSA as a result of domestic livestock grazing, mining and logging, may seriously impair the recovery of bald eagles in the Greater Yellowstone Ecosystem," (Harmata, 1987).

The DEIS admits to foreseeable impacts on water quality necessary for fish production, and on seclusion as a result of increased access. However, the document fails to examine the relationships of these impacts to the survival of bald eagles. Specifically, the DEIS states that should the plan be implemented, 6100 acres would be logged, which would "adversely affect cutthroat trout habitat by increasing erosion and sediment production... The effects of road building and logging north of the Divide could significantly affect soil stability, water quality and siltation deposits in irrigation reservoirs such as Lima Reservoir... levels of erosion and slumping may increase on 16,811 acres of unstable soils if development activities occur (DEIS, page 53).

The failure to conduct the necessary analysis of such impacts on the endangered bald eagle, required under NEPA and the ESA, is a serious deficiency and must be corrected in the revised EIS.

F-7 C. WOLVES

1. The DEIS fails to recognize the unique potential of the Centennials in aiding in the recovery of the Rocky Mountain Wolf in the Greater Yellowstone Ecosystem. The DEIS also fails to assess the impact of proposed activities on wolves or to ensure the protection of quality habitat necessary for this threatened species, as required by NEPA and ESA.

The DEIS dismisses wolves with a single sentence: "No observations have been reported in the past 10 years, and wolves are not believed to presently inhabit the study area." However, as discussed earlier, the Centennials is the only major natural land bridge connecting the Greater Yellowstone Ecosystem with another ecosystem that contains a wild and free-roaming wolf population. Only the Centennials can provide the important habitat necessary to allow wolves to reintroduce themselves naturally into the Greater Yellowstone Ecosytem, or to supplement an artificially introduced wolf population.

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F-7 cont.

However, the DEIS fails to appropriately assess the important potential role of the Centennials in wolf recovery in the Greater Yellowstone Ecosystem. In fact, the document contains no discussion of this subject. The DEIS must be revised to consider these critical issues and to ensure that this natural land bridge in the CMWSA remains intact under the direction of the preferred alternative.

The fact that wolves are presently not known to occur in the CMWSA does not relieve the agencies from the responsibility of assessing impacts of proposed activities on wolf habitat, required by NEPA and ESA. Such analysis is critical in light of the extinction of the wolf in the Greater Yellowstone Ecosystem. GYC places high importance on recovering this species, which is the only one known to be missing from the entire Ecosystem. In fact, the CMWSA contains considerable high quality wolf habitat because of the abundance of prey species, such as elk, deer and moose.

This potential would be adversely affected by management activities which impact major prey species such as elk. The DEIS anticipates such effects, stating that: "the loss of elk cover due to timber harvest or mineral development could bring about a more restrictive hunting season, plus a short term (25 - 30 year) displacement of elk in fall and winter until cover is recovered," (DEIS, page 52). However, the DEIS fails to assess how wolves could be adversely affected by this consequence. This serious deficiency must be remedied in the revised EIS.

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F-1 D. PEREGRINE FALCON

1. The DEIS fails to adequately assess the impacts of proposed actions and to protect habitat necessary for the recovery of peregrine falcons.

As the DEIS indicates, the hacking of captive-reared peregrine falcons in the Centennial Valley has resulted in the establishment of the only known wild nesting pair of this species in Montana. These birds rely on the Red Rock Lakes National Wildlife Refuge and surrounding wetlands for waterfowl, and on the CMWSA for suitable nesting habitat (DEIS, pg. 38). The DEIS fails to show, however, how activities in the CMWSA such as logging and roadbuilding will affect suitable nesting habitat.

Since peregrines are sensitive to pollutants, particularly chlorinated hydrocarbons (GYC Rpt., p. 27), it is critical that the DEIS show how the use of present and proposed compounds in the area will affect this endangered species. In particular, the use of fertilizers and herbicides on the Sheep Experiment Station and other federal lands could have serious adverse impacts on peregrine falcon reproduction. However, the DEIS totally fails to discuss such critical issues. These deficiencies must be corrected in the revised EIS, so that optimal conditions for peregrine recovery can be assured.

BIG GAME SPECIES

1. The DEIS perpetuates, and in some areas accelerates the process of degradation and fragmentation of critical big game habitat.

Where substantial portions of big game habitat have become unavailable through development, the best thing that the management agencies can do on the remaining habitat is to leave it alone, to conduct a stringent program of road closures, and to support the acquisition of development easements on key threatened winter range on nearby private land. The revised EIS should adopt this approach and incorporate the following improvements:

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a) Road closures should be permanent, year-round and complete, including closures to administrative access, in order to restore and ensure open road densities necessary for big game.

b) Big game species in the CMWSA should be considered at the early stages in the planning of timber sales. Habitat effectiveness models should be employed early in the planning process to ensure optimal areas for logging, rather than used late in the game to attempt to correct the impacts of proposed timber sales. In addition, Montana Fish, Wildlife and Parks should be integrally involved in all planning stages for any activity that could adversely affect big game.

c) Efforts should be made to protect critical winter range, migration routes and staging areas where such areas exist on private lands. Groups such as the Conservation Endowment Fund could be helpful in this process, through the acquisition of development easements.

d) The monitoring of range condition and trends for big game should be accomplished. Where downward trends are noted, management should respond in non-intrusive ways that protect big game in the CMWSA.

A discussion of additional specific deficiencies and recommendations follows.

G-2

2. The DEIS fails to adequately assess or mitigate the impacts, singular and cumulative, of oil and gas development, road building, timber harvest, motorized vehicle use, and grazing on elk and other big game species.

Although the DEIS anticipates some adverse effects on elk and other big game species, it fails to fully analyze or minimize these impacts. A cursory and piecemeal approach is inadequate to evaluate the cumulative impacts on big game, which are increasingly sensitive to disturbance and habitat disruption because of the current limitations in available quality habitat.

Of particular concern is the protection of adequate security cover, a major limiting factor of ungulates in the arid and open Greater Yellowstone Ecosystem. According to Montana Fish, Wildlife and Parks biologist Howard Chrest, the most limiting factor on the elk population in the Centennials is security cover. In light of past logging and road

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building activities, and currently heavy elk hunting pressure, any additional roads or timber harvest in areas frequented by these animals will probably have adverse effects on the health of big game populations.

The GYC Report (p. 143) supports this conclusion, noting that: "both lodgepole pine and Douglas fir areas have been extensively cut with negative effects on the elk habitat of the Targhee National Forest (Parker at al, 1983). Logging may potentially degrade elk habitat in the Price and Tipton Creek areas," (Chrest and Herbert, 1983).

The Plan must be revised to include a cumulative effects analysis, which is used to ensure maximum protection for big game species.

3. The DEIS contains contradictory and confusing statements about actions planned in the Targhee portion on the CMWSA, which could have serious and irreversible impacts on big game.

Impacts on big game in the area, already severe, will be exacerbated if high quality habitat in the Targhee side of the CMWSA is logged, projected in the out-decades of the plan as follows: 1991 - 2000, 2.5 mmbf; 2001 - 2010, 1.6 mmbf; 2011 - 2020, 3.5 mmbf; 2021 - 2030, 2.6 mmbf. In light of the volume of large diameter Douglas fir (25 mmbf annually) used by the Louisiana Pacific mill at Rexburg, and the relatively limited supply on the Targhee, fir from less accessible places like the Centennials will be increasingly attractive in the future. Since this timber currently provides critical habitat for big game species in an increasingly habitat-limited area, grave wildlife-timber conflicts can be expected if this planned timber program is implemented.

Not only did the DEIS fail to address these issues not addressed, it apparently contradicts the management direction set by the Forest Plan. The DEIS states that "Targhee National Forest lands (in the WSA) will be managed for an increase in the elk population and a small increase in elk security cover... No timber harvest is planned on Targhee National Forest lands," (DEIS, p. 11). Which is it? Will there be timber harvesting or not? And, if this habitat is logged, how will elk security cover be protected?

This apparent contradiction between the Targhee Plan and

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the Centennials DEIS must be resolved in the revised EIS. GYC recommends adopting a no-harvest alternative for the Targhee Forest portion of the CMWSA, and revising the Targhee Plan accordingly.

4. The Plan makes questionable assumptions regarding mule deer habitat, and the effects of management on this habitat.

On page 35, the DEIS states "... the quality of shrub species limit the Idaho side to less than optimum conditions for mule deer." This statement is from a discussion of summer range. While mule deer may use shrubs in the summer, it is common for those in this area to rely heavily upon forbs as summer food. It appears that this portion of the evaluation is flawed for several reasons, and that habitat on the Idaho side ought not be dismissed as inferior without further scrutiny.

The comment concerning winter range limiting deer is a truism that may or may not apply to this area. No evidence to support this contention is given. At least some of the deer population appears to use winter ranges 20-25 miles from the Centennials, which is considered preferred habitat. How much impact do the current grazing and logging programs have upon the deer population in the area, however? Have current land use policies on the south side of the range impacted the deer winter range to the point where development activities are now the primary limiting factor?

The DEIS should be revised to test these assumptions, to assess the impacts of intensive development on quality mule deer habitat, and to adjust management directions based on the findings of this analysis.

5. The DEIS fails to recognize the unique role played by the Shiras moose in the Greater Yellowstone Ecosystem and the CMWSA, and to grant this subspecies the protection it deserves.

H-1

On page 10 and 37 of the DEIS, the status of the moose is discussed in a fashion that is inadequate, albeit typical of the current generation of EIS documents. This treatment is not adequate for the following reasons: 1. The Shiras moose is a distinct subspecies which has a very limited distribution in Montana and adjacent states; 2. It is a habitat specialist which is exceedingly vulnerable to human induced changes in land use, and 3. The Centennials are located in the center of the distribution of Shiras moose.

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cont.

Because this subspecies is distinctive, has limited distribution, is vulnerable to impacts and has small population sizes, careless management could easily make it a threatened subspecies. If there is any area where the Shiras moose should be given thorough discussion and priority consideration, it is in the Centennials. The revised EIS should begin the process of giving the Shiras moose the attention and protection it deserves. Specifically, a research and monitoring effort should be launched to address such questions as: What portion of the total moose habitat do the Centennials represent? How does this portion relate to the whole? How do various management actions affect behavior and distribution? Future management directions should be adjusted to implement the findings of this research and monitoring program, in order to maintain the viability of this unique population.

6. In its discussion of displacement of elk, the DEIS fails to consider the already limited supply of quality elk habitat.

The DEIS indicates that elk will be displaced by timber and roading activities, but fails to discuss where they will go. Montana Fish, Wildlife and Parks Department and Idaho Fish and Game Commission have made the currently limited habitat situation abundantly clear. If additional habitat becomes unavailable even for a short time, will displaced animals be able to find alternative areas, or will they simply decline in numbers, as past trends indicate? Such questions must be addressed in the revised EIS, with consultation and guidance from the involved state game agencies.

7. The DEIS fails to discuss the possibility of reestablishing bighorn sheep in the Centennials.

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Bighorn sheep, once abundant in the Centennials, is one of the three species known to be extinct in the area. (The other two are wolves and bison). The DEIS states that: "suitable habitat remains; however, it is believed that historically bighorn probably migrated to suitable winter habitats. Reestablishing historical migrations is not practical at this time. For this reason, the introductions of possibly non-native mountain goats was approved..." (DEIS, p. 37).

This explanation does not make sense. If suitable

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H-4 cont. habitat remains, how can it not remain at the same time? Or does it only remain for the introduced goats? Barring unacceptable levels of competition, what precludes the agencies from reintroducing bighorns at this time? Careful examination of potential bighorn sheep winter range should have been conducted, and an analysis of the practicality of reintroduction of bighorn sheep made prior to transplanting an exotic species. The reintroduction of non-native species should never take priority over a native one, especially one so abundant elsewhere in Greater Yellowstone and so successful at recolonizing formerly occupied areas.

The DEIS must be revised to explore the possibility of reintroducing bighorn to the Centennials. Modifications of the current domestic sheep grazing programs in the CMWSA to accommodate the bighorn and to avoid disease transmission to the wild population must be also examined. These measures must be instituted if reintroduction occurs.

8. The DEIS fails to examine the possibility of reintroducing bison to the CMWSA.

H-5 The DEIS fails to address the issue of bison in the CMWSA. Although it mentioned their former abundance in the area, the document did not discuss whether or nor sufficient habitat remains to support a reintroduced bison population, or the practicality of such an introduction.

Bison could enhance the wilderness attributes of the Centennials, and would help complete the species complex that formerly occupied this portion of the Greater Yellowstone Ecosystem. Furthermore, bison could play an important ecological role in the CMWSA and the adjacent refuge lands, by aiding in the process of nutrient cycling in a cold, high elevation area noted for slow rates of decomposition. Although this service is partly provided by livestock today, bison could perform this function better by allowing deteriorated riparian areas to be restored. (Bison tend to hang in riparian areas less than cattle).

Bison are readily available from Yellowstone Park and the surrounding area. The cost of reintroducing bison would be minimal, and based on the experience in Yellowstone, would probably be effective. In addition, despite abundant myths, bison have never been known to transmit brucellosis to cattle, and do not necessarily compete for forage, due to some differences in food preferences.

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The possibility of reintroducing bison to the CMWSA should be examined in the revised EIS.

MANAGEMENT INDICATOR SPECIES

1. The DEIS fails to adequately protect Species of Special Concern identified by the states of Montana and Idaho.

The DEIS characterizes the CMWSA as "exceptional in diversity of management priority species," (DEIS, pg 38) as measured by the occurrence of 13 Species of Special Concern. Species of Special Concern and the Management Indicator Species used by the Forest Service in forest plans can provide useful measures of trends in ecological diversity over time. The reason is that these species, although not endangered or threatened, are extremely sensitive to disturbances from such activities as logging, road building, mineral exploration and development, and grazing.

The DEIS fails to show haw these designated species will be protected, particularly in light of continued development activities planned in preferred habitat areas. This deficiency must be corrected in the revised EIS.

2. The DEIS fails to display management standards required for the protection and maintenance of each Species of Special Concern.

The DEIS entirely fails to show any criteria or even general directions for the management of Species of Special Concern. This deficiency runs counter to the full disclosure requirements of NEPA, and undermines the special administrative recognition given by Montana and Idaho to such species. These species, especially those which are disturbance-sensitive and/or dependent upon late successional habitats, warrant highest priority protection in the Greater Yellowstone Ecosystem. The reason is that they have shown alarming declines in other parts of their ranges and may find a needed sanctuary in the Centennials portion of Greater Yellowstone.

These important deficiencies must be corrected in the revised EIS.

2a. The DEIS fails to show the effects of implementing

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the Management Plan on Species of Special Concern.

Although the DEIS does recognize that any of the alternatives that involve management for non-wilderness values has negative impacts on wildlife, there is virtually no discussion of the specific singular or cumulative impacts of implementing the preferred alternative on Species of Special Concern. This deficiency runs counter to the intent of NEPA, potentially undermines the protection of biological diversity in Greater Yellowstone, and should be corrected in the revised EIS.

2b. There is an inexplicable discrepancy between the Species of Special Concern used in Idaho and Montana, and the Management Indicator-Species applied by the Targhee and Beaverhead plans, which could potentially undermine the purpose for which these programs were designed.

The purpose of the MIS and Species of Special Concern programs is to track sensitive species which rely on particular habitat types and areas. These species can be effective ecological barometers for the CMWSA and the Greater Yellowstone Ecosystem. Like canaries in mining shafts, they can be effective as warning devices, signaling the need for management action. A decline in an MIS over a significant area, for example, can be the first signal in a chain of events that could lead to ecological catastrophe.

The way these programs are designed, however, precludes the necessary examination of the same species over a wide area, except for elk. The Species of Special Concern are listed on p. 36-37 in the DEIS. The counterpart to these species on the national forests are the Management Indicator Species. The MIS for the Targhee Forest are: Williamson's sapsucker, pika, mountain goat, bighorn sheep, elk, beaver, Brewer's sparrow and antelope. The MIS for the Beaverhead are: grizzly bear, peregrine falcon, bald eagle, grey wolf, elk, sage grouse, pine martin, goshawk, trumpeter swan, arctic grayling and cutthroat trout. None of these lists fully overlap except in the case of elk, even where similar habitat types are involved.

The DEIS should be revised to develop a coherent list of sensitive species that can be tracked over sufficiently broad areas, so as to effectively measure trends. Where possible, similar species should be used by adjacent jurisdictions to enable ecological trends comparisons.

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3. The DEIS fails to recognize the link between what happens to the Species of Special Concern, and the ecological dynamics in the Greater Yellowstone Ecosystem.

The only potentially effective way to assess ecological trends in Greater Yellowstone over time is through tracking what happens to Species of Special Concern or Management Indicator Species. However, the DEIS fails to recognize this important relationship. As a result, the DEIS fails to assess how the Greater Yellowstone will be affected by the Plan. This deficiency must be corrected in the revised Plan.

4. The DEIS fails to develop a monitoring program for Species of Special Concern, so that corrective management actions can be instituted if adverse impacts are observed.

Monitoring of habitat and populations of Species of Special Concern is the only way to assess complex long-term cumulative impacts on these sensitive species. However, the DEIS entirely fails to discuss this important aspect of a program. This failure undermines both NEPA and the purpose for which Species of Special Concern were designated. This deficiency must be corrected in the revised EIS.

FISHERIES

1. The DEIS fails to adequately assess impacts or to protect the valuable fisheries of the Centennials.

"The fisheries of the Centennial Mountains and Valley play an integral role in the biological stability of the aquatic system and surrounding area," (GYC Rpt. p. 144). The GYC Report also states that: "the fish of the Centennial represent a resource of high importance to people who use the Centennial ecosystem for recreation." Of particular public interest are native cutthroat trout, and arctic grayling. In
I-2 fact, the only native population of arctic grayling in Montana is found in the Centennials. A Species of Special Concern, grayling is considered an effective indicator of overall habitat quality, particularly spawning streams (GYC Rpt. p. 98). The reason is that grayling are easily impacted by poor substrate conditions, pollution, excessive turbidity, and low water flow in spawning streams.

The Red Rocks Lake National Wildlife Refuge has recognized the value of this unique species, and its importance as an indicator of long term trends in the Ecosystem. Furthermore, refuge managers have initiated an

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active research and management program, involving telemetry and transplanting studies, as well as plans for rehabilitating degraded but formally significant spawning streams. Furthermore, U.S. Fish and Wildlife Service is currently negotiating with private landowners for an easement along Odell Creek to protect grayling spawning habitat (GYC Rpt. p. 145).

The DEIS should be revised to complement the fisheries conservation efforts of these agencies.

2. The DEIS fails to recognize the important ecological connections of the fisheries in the Greater Yellowstone Ecosystem, particularly the relationship between the fish in Red Rock Lakes Refuge and upstream portions of the CMWSA.

This deficiency undermines both full disclosure requirements of NEPA and the downstream management efforts to protect grayling on the refuge. The high level of human development proposed on the erosion-prone upstream areas in the CMWSA could seriously, and perhaps irreversibly damage this important fishery for grayling and other species.

The revised EIS must recognize the important interjurisdictional connections of the fisheries resource, document the cumulative impacts of proposed activities, and place highest priority on protecting the irreplaceable fisheries of Greater Yellowstone.

3. The DEIS fails to accurately locate arctic grayling in the CMWSA.

Although recognized as a Species of Special Concern, arctic grayling is identified as "extirpated" on page 10 of the DEIS. This is not true! These fish live in small portions of the CMWSA, specifically upper Red Rock Creek and Hell Roaring Creek, Corral Creek, Antelope, Tom and Odell Creek (GYC Rpt., Figure 13). The DEIS should be revised to reflect this reality.

4. The DEIS fails to fully document the impacts on the fisheries resource that would occur if the Management Plan were fully implemented.

The DEIS does recognize that the fish will be adversely impacted as a result of upstream development proposed in the management plan. For example, the DEIS states on page 2 that: "the west slope cutthroat habitat in the northwest end

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would be adversely affected in the short term from increases in siltation caused by logging and road building." In addition, the DEIS states that "the effects of road building and logging north of the Divide could significantly affect soil stability, water quality, and siltation deposits in irrigation reservoirs, such as the Lima Reservoir."

There is currently substantial evidence to show that water quality in the Centennials is currently deteriorating as a result of intensive development. (See point 5 of this section). If the plan is implemented as written, this trend can be expected to continue, with serious and potentially irreversible impacts on the fisheries resource.

The GYC Report states on page 144 that: "Perhaps the most acute of the threats on this once unique and spectacular fishery is the severe degradation of water quality and spawning habitat. Excess siltation and pollution of streams will directly affect grayling and trout by eliminating spawning habitat, suffocating eggs and fry."

These impacts are known to occur as a result of inappropriate logging and road building on unstable soils upstream, overgrazing by livestock and bank encroachment by livestock and livestock trampling, and dewatering for agriculture (Id. at p. 144). In areas of high soil erosion and steep slopes, as occur in the Centennials, a synergistic negative effect has been documented, caused by increased bedload and turbidity; the reduction of bank cover; and the precipitation of excess flow fluctuations; reduction of aquatic invertebrates, and accelerated eutrophication and filling of lakes. The DEIS however, entirely fails to assess the cumulative role of these factors in light of the projected development upstream on the fisheries resource. This serious deficiency must be corrected in the revised EIS.

5. The DEIS fails to show how the Management Plan will achieve Montana state water criteria.

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If the Plan is implemented as written, there is a high likelihood that the Montana state water quality standards will be exceeded. In fact, Water Quality Bureau data of 1982 shows that for the Red Rock River above the Lima Reservoir, "excess suspended sediment, nitrogen and phosphorous levels are deteriorating water quality to the point that aquatic life and recreational uses are suffering. More specifically, data collection on Odell Creek in section 31 [in CMWSA] show an elevated suspended sediment concentration of 35 milligrams

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per liter (mg/l). This value is above the concentration of 25 mg/l which is known not to cause adverse effects on aquatic life" (Zucker, 1972). The data also shows total coliform levels above the Montana average," (DEIS p. 33).

If logging and road building and grazing activities continue as they have in the past, such water problems can also be expected to continue. The revised EIS must show how the Management Plan will meet the Montana water quality standards and will present further deterioration of the valuable aquatic resource.

BIRDS

The diversity of bird life in the CMWSA is extraordinary, and unsurpassed anywhere in the Greater Yellowstone Ecosystem. Approximately 255 species of birds have been recorded in the Centennials and surrounding lands, including over 150 breeding species, 28 species of waterfowl, 20 species of shore birds, 5 species of owls, and over 75 species of breeding passerines. The reasons for this high level of diversity include the abundance of water and wetlands, and the array of habitat types within close proximity to each other, such as wetlands and marshes, low to mid-elevation grasslands, sagebrush grasslands, and upland forests.

I-3

1. The DEIS fails to recognize the value of the avian resource in the Centennials, to assess impacts incurred by proposed activities, and to award it adequate protection.

The DEIS fails to recognize that the Centennials provide habitat for some of the most diverse bird life in the Greater Yellowstone Ecosystem. Such diversity requires special protection, particularly in light of the vulnerability of many of these bird species to habitat disruption. However, the DEIS almost entirely fails to indicate what impacts can be expected from implementation of the Management Plan on various bird species. The DEIS only mentions several upland game birds and Species of Special Concern, which represent less than 5 percent of the entire bird fauna in the Centennials.

Because many of the birds of the Centennials spend part of their life cycle on the refuge and part on surrounding areas, it is imperative to evaluate the impacts of the Management Plan in a holistic way. Such an assessment will likely show that the cumulative effects on the avifauna of

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the Centennials is worse than described in piecemeal fashion in the EIS. These impacts could potentially undermine the purposes for which Red Rocks Refuge was set aside: the protection of waterfowl and other bird populations. Major factors include the impact of current deterioration of water quality and quantity on birds, and the change and fragmentation of vegetation as a result of logging, excessive grazing and road building.

These deficiencies must be corrected in the revised EIS.

2. The DEIS fails to assess the impacts of development activities in the CMWSA on trumpeter swan and fails to ensure adequate protection of habitat necessary for their recovery.

Although the trumpeter swan is neither listed as endangered nor as a Species of Special Concern in Idaho or Montana, it is exceedingly vulnerable to extinction as a separate population in the lower 48 states.

Perhaps the most magnificent and noted symbol of the Centennials area, the trumpeter swan enjoys a history of a recent come-back in the continental U.S. Considered one of the great successes in American wildlife conservation, the story is centered at Red Rocks Refuge, where managers have placed highest priority on protecting the population.

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However, recent declines in the population size and productivity of those swans which permanently reside in the tri-state area (Montana, Idaho and Wyoming), now raise serious questions about their long-term survival (Gale, 1987). It is clear that if this unique population is to be recovered, careful management of nesting and forage habitat on the refuge, Lima Reservoir, and upstream areas in the Centennials is required.

The DEIS entirely fails to recognize the important connection between habitat upstream of the Refuge and Lima Reservoir and the survival of trumpeter swans. Yet, heavy sedimentation, originating from disturbances upstream, is known to damage the waterweed and other aquatic vegetation eaten by swans. In addition, man-caused pollution and water shed abuse by domestic livestock, logging and roading have been identified as major negative factors affecting swan survival (GYC Rpt. p. 95). If sedimentation and pollution are allowed to continue and accelerate as proposed by the Management Plan, the continued existence of the distinct tri-state swan population could be jeopardized. In particular,

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I-1 cont. Red Rocks Refuge and Lima Reservoir, an important staging area for subadult swans, could be seriously degraded as a result of intensive logging upstream -- an impact not mentioned in the EIS.

The DEIS shows no recognition of the importance of such impacts on swans, despite the known sensitivity of these only resident populations of swans remaining in the Continental U.S. In fact, the language in the DEIS appears to absolve managers of any responsibility to protect the population in one of the few sentences where it was mentioned: "Off site factors, such as human disturbance, may have a bearing on trumpeter swan survival, but the interrelationship is not clear at present," (DEIS, p. 38). This statement entirely misses the point. Although it is true that there is much that is not known about such complex interrelationships, there is, at this time, sufficient information upon which to base intelligent management directions (Gale, 1987). More information is soon to be released. Furthermore, the agencies cannot relinquish a clear responsibility to manage wildlife, even if all the factors are not currently known. This is especially important where a potentially endangered species is involved.

The DEIS must be revised to include available information about this vulnerable population, and to take every precaution to ensure its continued survival. This revised document must correct these deficiencies and show how agencies will exercise their responsibility for the last breeding population of trumpeters in the lower 48 states.

FLORA

The DEIS fails to acknowledge the high floristic diversity in the CMWSA, and fails to provide adequate protection to the rare vascular flora.

F-5 The diversity of habitat types and plants in the Centennials is exceedingly high, and of particular interest not only to botanists, but to all concerned with the protection of biological diversity in the Greater Yellowstone Ecosystem. As discussed earlier, within the Centennials there is a high diversity of macro- and micro-environments which has resulted in a great number of vascular plant taxa. In a 1968 survey of the Red Rocks Refuge and the Centennial Mountains, Bob Dorn found 487 species in 243 genera and 63 families (approximately 21% of the state's flora), (GYC Rpt., p. 91). "Such high floristic diversity in a comparatively

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F-5 cont. small area is always of phytogeographic interest." (Id. at p. 91).

The number of rare and unique plants in CMWSA is also high. "Although there are no taxa known to be strictly endemic to the region, a number of taxa occur there which are either regional endemics, or occur on the edge of their range in this portion of Montana" (GYC Rpt., p 87). The following is a list of known rare vascular flora from the CMWSA area. These plants are presently under consideration for listing as

Species of Special Concern in Montana by the Natural Heritage Program.

Allium acuminatum
Astragalus terminalis
Carex multicostata
Carex vallicola
Castilleja gracillima
Haploppapus nanus
Kobresia simpliciuscula
Lesquerella carinata
Ligusticum filicinum
Pteryxia hendersonii
Ranunculus jovis
Senecio debilis
Stephanomeria spinosa
Thelypodium sagittatum

The DEIS entirely fails to mention the existence of these species, to discuss what will happen to them when the plan is implemented, or to ensure that they will be protected until assessed for suitability for listing by the Montana Natural Heritage Program. In light of the substantial of activity proposed by the Management Plan, and of the relatively little information available on the natural history and threats to these species, it is critical that extreme caution be exercised in order to prevent extinction of these plant populations. "The maintenance of these species within the region will depend on compatible management schemes, and strict preservation of critical habitat where necessary. Much further study is necessary before conclusions can be reached regarding the interaction and relationships of these species with detailed environmental factors. Study is needed, as well, to determine the most appropriate management strategies to be used" (GYC Rpt., p. 91).

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F-5 cont. In addition, field inventories are needed in many cases to define the exact location of the rare plant species in the region. "During the course of such work, new populations of these would undoubtedly be found, and additional Species of Special Concern in Montana would likely be discovered (Id. at p. 91). The following taxa are some of those which may possibly be found within the region (Id. at p. 91):

Astragalus argophyllus
Carex idahoa
Gentiana aquatica
Ipomopsis congesta
Lepidum montanum
Primula alcalina

The DEIS must be revised to determine basic locations of known rare plant species, to inventory the area for new populations and species, and to develop management schemes which will protect these species and populations.

ECOLOGICALLY SIGNIFICANT AREAS

1. The DEIS fails to award adequate protection to areas identified within the CMWSA as ecologically significant or special.

O-6 Portions of the CMWSA and adjacent areas have been designated as: ACEC (Area of Critical Environmental Concern) (BLM); National Natural Landmark (Red Rocks Refuge); Research Natural Area (USFS). In addition, the Montana Natural Heritage Program has nominated several sites in the CMWSA for consideration as Natural Areas. In various ways, these labels show the ecological significance of portions of the CMWSA. However, the DEIS fails to explain the meaning of these terms, to assess the impacts on these areas, and to ensure that the special attributes for which these areas were designated will be protected under the plan. These deficiencies must be remedied in the revised EIS.

C. RECREATION

Recreation is the major economic activity in the Greater Yellowstone Ecosystem and the CMWSA. Recreation visitation has increased in Yellowstone Park dramatically over the years, from 5,438 in 1895 to 2.2 million in 1984. As recreationists entering the Park by the West Yellowstone entrance continue to increase at 2-3%/year (Gallatin National Forest, 1987), visitation in the CMWSA can be expected to

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rise also. This growth can be expected to benefit the economy of the region. According to a recent report by the Congressional Research Service, in the Greater Yellowstone Ecosystem recreation supports 66% of total direct and indirect jobs dependent on the public lands, including over 1,200 jobs for downhill skiing and more than 2,800 jobs for other forms of recreation.

GYC believes that recreational use, if conducted with sensitivity and respect of the resource, is the highest and best use of the lands that comprise Greater Yellowstone. Not only does recreation currently make the greatest contribution to local and regional economies, it comes the closest to incorporating the values of environmental stewardship of any of the other uses of the national forest lands in the Ecosystem. Recreation, whether at a picnic table or a mountain's edge, brings humankind back to a realization of his or her place in the planet and the natural scheme of things; it reminds us all of our origins and the ecological cycles. It teaches us all humility amidst the majesty of Yellowstone. It offers us something that cities and suburbs cannot replace: quiet, space, the opportunity to observe wildlife in their natural habitats.

Surely, as populations grow, such experiences will become more valuble, economically, ecologically and spiritually. It is paramount, therefore, that the public lands of Greater Yellowstone such as the CMWSA be managed so as to protect the long term value of the recreational resource.

1. Although the DEIS verbally recognizes the importance of recreation, it fails to translate these words into committed agency action to protect and enhance recreational opportunities in the CMWSA.

An escalation of recreational conflicts with timber, mining and grazing can be expected if the Plan is implemented as written. In the CMWSA, as elsewhere in Greater Yellowstone, recreation benefits are tied directly to wildlife opportunities. 75% of the recreationists who visit Red Rock Lakes Refuge, for example, seek wildlife viewing opportunities (GYC Rpt., p. 138). Activities which adversely affect wildlife therefore impact recreation, especially primitive forms such as bird watching, hiking and hunting. Thus, all comments on wildlife and biological diversity also apply to recreation.

91MM

The EIS should be revised to grant the highest priority to primitive, nonmotorized recreational uses of the CMWSA. Adoption of the 92,000 acre Ecosystem Alternative would provide maximum protection for recreation, while reducing conflicts with other resource uses.

D. TIMBER HARVEST

1. The DEIS fails to plan a timber program that is compatible with the long term maintenance of the recreational, wildlife and scenic resources.

Timber harvest makes comparatively little contribution to the total employment and income provided by public lands in the Ecosystem. Of all the direct jobs based on uses of the seven forests in Greater Yellowstone, timber harvest activities account for only 11%, compared to 66% for recreation (CRS, p. 70).

Large-scale practices of clear-cutting and selective harvest have and continue to reduce habitat effectiveness for a variety of species, as discussed in detail in these comments. It is the opinion of the Coalition that the Forest Service and BLM can sustain a small, regionally based timber economy that is compatible with the long term health of Greater Yellowstone. The revised EIS should display a rational balance of timber, recreation, and other activities that fulfill the recommendations contained herein.

2. The DEIS fails to remove from timber production those lands in the CMWSA where erosion and landslide potential is severe.

The Centennials Mountains are noted for their naturally high level of slope instability and potential for soil erosion. Landslides and erosion problems have been extensively documented, some correlated with past road building and timber harvest (Montagne, 1987). Areas of high erosion and mass failure potential include: the north-facing front of the eastern portion of the Centennials; Odell Creek; the south side of Sheep Mountain; Hell Roaring Creek, and the upper slopes of Slide and Baldy Mountain.

The past occurrences of landslides indicate the probability of future damage from harvest and road building activities. This is likely when such activities occur on volcanically derived or clay-laden soils, steep slopes, landslide debris and areas of sparse vegetation, such as

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occur throughout much of the CMWSA.

The EIS documents tie erosional potential in the CMWSA, but fails to assess associated impacts or propose any action to protect the soils resource. In fact, the EIS anticipates that erosion and slumping may increase on 16,811 acres, or 48% of the unstable soils in the CMWSA. Such an increase can be expected to affect the water quality on the Red Rocks Refuge necessary for the survival of waterfowl and fisheries, but how? The DEIS fails to address this question, and fails to provide any protective response mechanisms, should serious deterioration of the downstream resources result. These deficiencies must be corrected in the revised EIS.

In the attached report, Montagne recommends: "Road building and timber harvest should not occur on steep, clayey soils, old landslide debris, or on soils where re-vegetation will be difficult (clay-rich steep south facing soils) (Montagne, p. 31). In addition, Montagne recommends: "Disturbances such as road building, timber harvest, and excessive grazing should be minimized, especially where the erosion hazard is severe on Maps 3A and 3B."

L-2 Montagne also recommends developing a monitoring program to more accurately assess the impacts of grazing on erosion and mass failures, and on streambank stability. The findings of such an effort could be useful in adjusting management directions for grazing. The DEIS should be revised to adopt these recommendations.

E. FIRE AND TIMBER DISEASE MANAGEMENT

Maintaining and re-instituting a natural fire and and disease regimes is critical to the long-term health of the Greater Yellowstone Ecosystem. The plan, however, barely mentions the value of fire and timber diseases as management tools, which can be effective in restoring vigor to timber and wildlife forage.

In fact, fires of successional sufficient size and scale are necessary to reverse current trends and to maintain healthy aspen and early successional species. Diseases such as pine bark beetles and spruce budworm work closely with fire in this process. The Plan should be revised to allow natural fire in all existing roadless areas, and anywhere else in the CMWSA where human lives or property are not threatened.

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Furthermore the Targhee Forest should not enter the Centennials roadless areas in the event of a "catastrophe" such as a beetle epidemic. Timber diseases such as beetles and spruce budworm should be allowed to run their courses in the "Ecosystem Alternative" because they constitute a legitimate ecological response to fire suppression policies of the past.

F. GRAZING

1. The DEIS fails to assess the impacts of present and proposed grazing in the CMWSA on wildlife, fisheries, and recreational resources, and to ensure the protection of these resources.

Current excessive levels of grazing on public lands in the Centennials, particularly on the Sheep Experiment Station lands, are known to cause downstream water quality deterioration and vegetational damage (DEIS, p. 106; Montagne, 1987). This activity could have serious detrimental effects on wildlife especially the sensitive species on the Red Rocks Refuge.

L-9 cont. Despite these effects, the DEIS fails to reduce the grazing levels or to monitor the effects of livestock on other uses of the CMWSA. In fact, the DEIS plans to increase grazing by 13% on the 46,637 acres not recommended for wilderness. This increase can be expected to exacerbate impacts on other resources, particularly fisheries and waterfowl.

The DEIS must be revised to correct theses inadequacies, and to reduce livestock grazing to the level at which protection of wildlife and fisheries can be assured.

G. INTERAGENCY COORDINATION

The DEIS thoroughly fails to show the kind of close interagency coordination necessary to protect Greater Yellowstone.

As discussed in the Section II of these comments, close interagency coordination and shared vision and commitment is critical to a healthy Greater Yellowstone. This coordination is required by NEPA Section 102 (2) (c), FLPMA Section 202(F), RPA/NFMA Section 6 (a) and 14 (a), and ESA Section 7 (a) (4). Only through a comprehensive interagency analysis

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of cumulative effects of activities, such as logging, oil and gas development and roading on the wildlife, water, and plant resources of the Ecosystem can long-term effects be assessed and mitigated.

According to the 1986 CRS Report, "Coordination of Forest Service activities in the Greater Yellowstone region is not organized to assure consistent actions and effects." This is clearly demonstrated in the differences in mangement policies between the Targhee, Beaverhead, BLM, Red Rock Refuge and Agricultural Research Service, and are itemized in detail in these comments.

The cumulative impacts of these disparate management directions indicate serious threats to the integrity of Greater Yellowstone. The Plan must be revised to correct this inadequacy and to ensure the long-term viability of the Ecosystem.

VI. CONCLUSIONS

GYC requests that the BLM completely overhaul the DEIS, as recommended in the detailed comments herein. Adoption of the 92,000 wilderness as the Ecosystem Alternative would go far to resolve conflicts discussed in these comments in favor of the protection of Greater Yellowstone. In fact, this alternative is the only way to ensure that what remains as roadless in the Centennials portion of the Ecosystem is preserved intact. Even if this were to occur, however, GYC maintains grave concerns over the grazing provisions, and the research, monitoring and enforcement programs required to successfully implement a plan that would truly protect the Centennials, Red Rocks Refuge, and the Greater Yellowstone Ecosystem.

GYC welcomes the opportunity to discuss its recommendations in detail with the BLM and other involved agencies, and to help in the development of necessary improvements. We thank you for the opportunity to submit our views.

APPENDIX 1

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A MODEL FOR INFORMATION INTEGRATION AND MANAGEMENT FOR THE CENTENNIAL ECOSYSTEM

Greater Yellowstone Coalition

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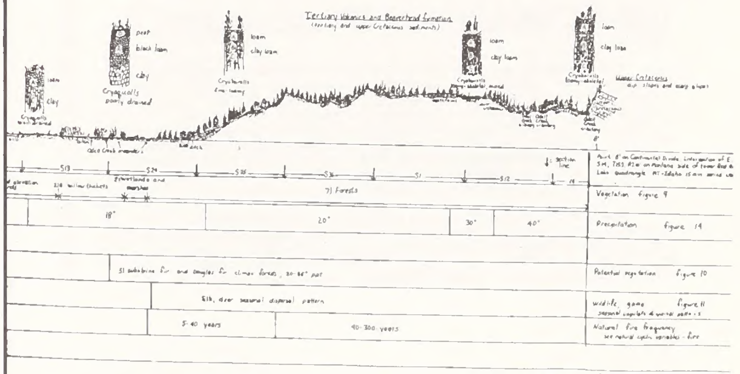
APPENDIX 2

EROSION POTENTIALS IN CENTENNIAL MOUNTAINS, SOUTHWESTERN MONTANA

CLIFF MONTAGNE
DEPARTMENT OF PLANT AND SOIL SCIENCE
MONTANA STATE UNIVERSITY
BOZEMAN, MT 59717-0002

MAY 1987


Tertiary Volcanics and Beaverhead formation
(tertiary and upper Cretaceous sediments)
peat
black loam
clay
Cryaquolls poorly drained
loam
clay loam
Cryoboralls
loam
clay loam
loam
clay loam
Upper Cretaceous
Cryaquolls well drained
section line
71 Forests
Vegetation figure 9
18"
20"
30"
40"
Precipitation figure 14
Potential vegetation figure 10
Elk, deer seasonal dispersal pattern
wildlife, game figure 11
5-40 years
40-300 years
Natural fire frequency
Baseline elevation

Centennial Ecosystem Cross-section B-B'

Greater Yellowstone

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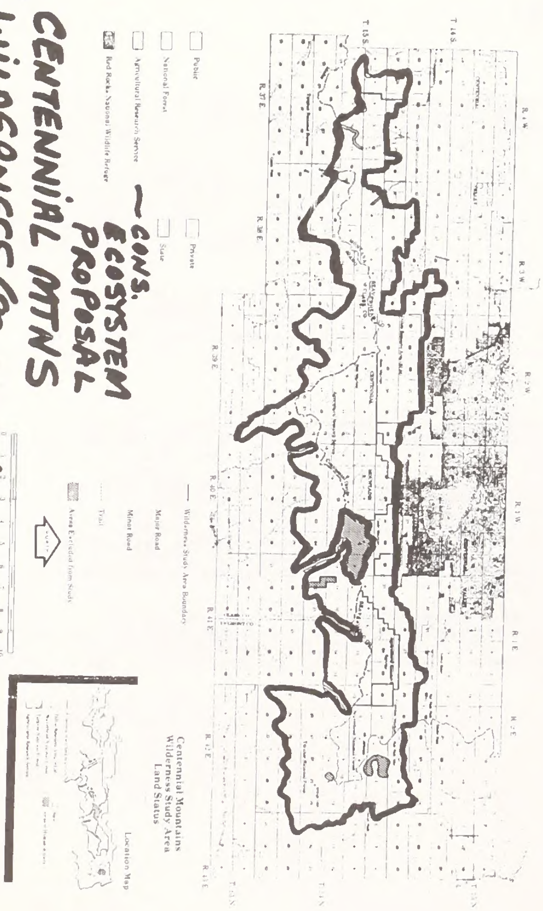
APPENDIX 3

CENTENNIAL MTNS WILDERNESS (92,000 AC.)

— CONS. ECOSYSTEM PROPOSAL


Public
National Forest
Agricultural Research Service
Red Rocks National Wildlife Refuge
Private
State
Wilderness Study Area Boundary
Major Road
Minor Road
Trail
Area Excluded from Study
Miles
Centennial Mountains Wilderness Study Area Land Status
Location Map
T. 14 S.
T. 15 S.
R. 37 E.
R. 38 E.
R. 39 E.
R. 40 E.
R. 41 E.
R. 42 E.
R. 1 W.
R. 2 W.
R. 3 W.
R. 1 E.
R. 2 E.

92A

Continental Divide Trail Society

P.O. BOX 30002
BETHESDA, MD. 20814

June 15, 1987

Mr. James Moorhouse
Manager
Butte District
Bureau of Land Management
P.O. Box 3388
Butte, Montana 59702-3388

Dear Mr. Moorhouse:

We are writing about the Centennial Mountains Wilderness Study and request that this letter be included in the hearing record.

The Continental Divide Trail Society urges favorable consideration of wilderness recommendations for the areas in the Centennial Mountains that lie along or close to the Continental Divide. As is evidenced by volume 2 of our Guide to the Continental Divide Trail, we are familiar with the area in detail.

O-16 We believe it would be a mistake to omit the Sheep Experiment Station from the wilderness study for the Centennial Mountains. Even though administration may have been transferred, the lands are an integral part of the ecosystem. Those which are suitable for wilderness designation should be so recommended.

Please continue to keep us informed about future developments.

Thank you.

Sincerely,

James R. Wolf
Director

93A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15 I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as fa as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

Livestock need to be able to graze the area also. Men do not know how t balance the natural order of things, and it is not done so especially through wildnerness. The Bird refuge has not been enhanced by wilderness. It is a known fact that the birds will not feed and nest on the long, soured, un-graz grasses allotted to them from wilderness. They go to where the cattle have grazed and enjoy greater benefits there. Grazing and proper management on it will make it more productive than it already is.

I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

6900N Hwy 41 Dillon Mt.

JUN 22 87

94A

Dear Mr. James Moorehouse;

Living in Montana all my life, I have had the experience of the Wilderness county. I would not want these area's destroyed by development. I have had a learning experience in the Wilderness country. These areas preserve the beauty of the County that is in our state

The Wilderness area protects our habitat, both endangered and hunting game. Without ~~with~~ such area's there would also be no protection from Watershed. Many acres of land or even people would be lost.

Our Wilderness is Vanishing, and once changed, the Wilderness can not be legislated back into existence. It is because of this that the truly wild places are of increasing Value to all of us. We must protect the precious little Wilderness we have.

Sincerely,

Joe Antonich

95A

6/14/87

Comments on Centennial Mtns. Wilderness Study

[illegible]
[illegible]
[illegible]

1. [illegible]

O-16

2. [illegible]

[illegible]

96A

June 11, 1987

Rod and June Ash
P O Box 957
Condon, MT. 59826

Bureau of Land Management
Butte District Office
P O Box 3388
Butte, MT. 59702

We wish to comment on the Centennial Mountains wilderness study. My wife and I have been visitors to the Red Rocks Wildlife Refuge adjacent to the area being considered in the wilderness study. We consider the refuge and the Centennial Mountains to be among the most beautiful and wildlife productive areas we have ever visited. For example, we identified seventy bird species on the refuge in two days last summer. We also saw a variety of mammals. The refuge needs the protection that the maximum wilderness designation for the Centennials would afford.

We understand that prior misuse of upland areas has aggravated the siltation problem faced by the lakes. The wildlife values of the refuge are immense and any increase in siltation must be prevented. Wilderness status for the Centennials would be an important contribution to solving the problem.

Apparently the BLM is recommending only 26,000 acres of the study area as wilderness. We believe that is a mistake. Much more of the Centennials deserve wilderness protection. As a nation whose wildlands are shrinking under development pressures while simultaneously the appreciation of and demand for wildlands values increase, we shouldn't surrender one of the most outstanding of the remaining wildlands.

It is a shame that the Tarhee National Forest didn't recommend any of its lands in the Centennials for wilderness. It borders on the arrogant that the agricultural Research Service refused to participate in the study.

It apperas to us that the whole Centennial Mountains - Red Rocks Wildlife Refuge complex comprises an absolutely unique land area whose natural values far outweigh any resource exploitive values. The whole 92,000 acres recommended by conservationists whould be kept as wilderness.

Sincerely yours,

Rod and June Ash

97A

GEORGE F. BAGGLEY

May 26 1987

Dear Mr. Moorhouse

In 1935 as chief Ranger of Yellowstone National Park I accompanied Ding Darling then Chief of the Biological Survey, to Red Rock Lakes to define the proposed refuge for the Trumpeter Swan followed by the purchase of land to complete the Refuge. [illegible] about the Refuge. I am therefore astonished at the proposed shortage in your proposed wilderness designation. Definitely should be the whole 92 acre [illegible] to insure the greatest protection for the Red Rock Lakes [illegible],

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and the [illegible] the [illegible] for the [illegible].

I do hope your final decision will be the largest acreage possible. I doubt the timber values of Idaho are worth the cost of the logging and [illegible].

Thanking you much

Sincerely

George F. Baggley

98A

P.O. Box 8787
Moscow, ID 83843
20 May 1987

Dear Mr. Moorhouse:

I have recently received and read, with dismay, your Centennial Mountains draft EIS. The recommendations contained in that document, especially for the Idaho side of the range, do a great disservice to the natural and wild values of that region.

O-16 No good justification is given for the failure of your study to even analyze the high wilderness values of USDA's Sheep Station. As a result, a big hole is left right in the middle of your study area. Nothing even remotely sound ecologically even got studied, let alone recommended for protection. You should remedy this flaw quickly, preferably in a draft supplement.

I know this area fairly well, and for that reason, recognizing its low resource extraction values but high public values, I fully support the Greater Yellowstone Coalition's 92,000 acre Wilderness proposal. Inclusion of lands on the Targhee side are especially vital if sound wildlife habitat protection is to be afforded in this area.

J-8 Lastly, I believe that your proposal relaxes too much the various water quality goals that ought to govern public lands in so wildlife-rich an area. Degradation of water and air quality in this area is not justified either economically or environmentally.

Kindly send me a copy of your final recommendations when they become available. I hope that they will be greatly improved over your current plan.

Sincerely,

Dennis Baird

99A

5663 Rogers Avenue
Port Orange, FL 32019
June 6, 1987

Mr. James Moorhaouse
District Manager
Butte District, BLM
Box 3388
Butte, Montana 59702-3388

Dear Mr. Moorhouse:

Belatedly, I have had the opportunity to review the Draft Environmental Impact Statement on the Centennial Mountains area. There are a number of questions that seem to imply that political and special interests have dominated the study, especially where the Forest Service is concerned.

O-16 The reasons for not including the Sheep Experiment Station in the wilderness proposal are not convincing. Why?

Why is the Targhee National Forest likewise left out?

It is hoped that the Forest Service will give further consideration to both of these areas. It appears to me that ~~that~~ the impacts of development on wildlife, recreation and scnic values of the Centennial Mountains have not been adequately considered.

Sincerely yours,

Walter S. Boardman
Walter S. Boardman

100A

P. O. Box 274
Virginia City, Montana 59755
June 9, 1986

District Manager
Butte District Office
Bureau of Land Management
P. O. Box 3388
Butte, Montana 59702

Dear Sir:

This letter is a vote for wilderness designation of 26,248 acres (Alternative 1 Centennial Mountains Wilderness Study and Environmental Impact Statement) for the Centennial Mountains.

The Centennial Mountains offer some of the best recreational opportunities in Montana. We owe it to future generations to preserve this resource. Over the next 100 years the population of the Salt Lake City and Denver areas is going to skyrocket and people who enjoy the outdoors will need areas such as the Centennial Mountains. In addition, we should do our best to protect the environment around the Red Rock Lakes.

My great grandparents settled in the Centennial Valley in 1894 and offspring ranched there into the 30's. One of the Bray homes still stands in Lakeview. It's great country.

Sincerely,

Tom Bray
Thomas K. Bray

101A

5/17/87

James Moorhouse - Dist. Mgr.
Butte ~~District~~ - BLM
Box 3388
Butte, MT. 59702

Dear Mr. Moorhouse,

Recognizing that you are one of the arbitors of the destiny of the Red Rocks/Centennial Wilderness Areas, I would like to register my disappointment with the proposed 26,248 wilderness designation for the Centennial area. The mere fact that the area is critical to the health of the entire Yellowstone eco-system suggests the need for increasing the acreage designated
I-1 as wilderness particularly on the eastern slope. To subject
I-2 the magnificent Centennial/Red Rocks to the short term benefits to be derived from grazing and timber leases and sales would jeprodize the prospects for the survival of both the tri-state Trumpet Swans and some of the last graylings in the lower 48.

For the spiritual future of our children, I would hope that you and your Forest Service counterparts would reevaluate the DEIS with an eye towards wilderness rather than financial interests.

Thank you.

Sincerely -
Gordon H. Brown
Box 379
Driggs, Idaho 83422

102A

479 E. 13TH STREET
IDAHO FALLS, ID 83401

JUNE 6, 1987

DISTRICT MANAGER
BLM DISTRICT OFFICE
P.O. BOX 3388
BUTTE, MT 59702

Dear Sir:

Thank you for the opportunity to review the Draft of the Centennial Mountains Wilderness Study/Environmental Impact Statement. In general the document is to be commended. I agree that the preferred alternative is a reasonable one and I support wilderness designation for the north slope portion. Indeed, I think inclusion of some of the Idaho portion could also be justified.

I do, however, have two problems with the document. First, the Alternative 1 wilderness boundary is most peculiar, enclosing an area that is not contiguous and in parts is only one-fourth mile wide. Presumably this boundary coincides with some boundary of the existing Red Rocks Wilderness. This issue could be made much more clear if your maps showed the portion of the Red Rocks Refuge which is already designated wilderness. If the alternative 1 boundary does not expand the Red Rocks Wilderness then the Alternative 1 boundary needs justification.

O-13 A second, related, issue is a lack of clarity in the logic for preferring Alternative 1 over the other alternatives. The reader has to frequently guess at the weighting applied to the advantages of the various alternatives. Comments on the non-preferred

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O-13 cont. alternatives are scattered and their importance difficult to evaluate. For example, are the difficulties of enforcing a mid-slope boundary south of the Divide more serious than enforcing wilderness regulations in some of the narrow sections of the preferred alternative? Are the visibility of disturbances from earlier human activities sufficient to disqualify areas in the southeastern portion of the study area? I think the reader would benefit from some summary explaining the criteria applied to the various alternatives and how the application of these criteria led to the selection of the preferred alternative.

In summary, you have done a good job. Your recommendation is not unreasonable. A few points of clarification in the document would be helpful.

Yours sincerely,

Stephen B. Brumbach
STEPHEN B. BRUMBACH

103A

[illegible]

I wish to comment on the Centennial Mountains Wilderness Study Area.

I feel that the elk area is one that should be preserved in its present [illegible] for future generations. [illegible]

[illegible] the area [illegible] the [illegible] Falls [illegible]

[illegible]

I [illegible] should [illegible] protected and [illegible]

G-1 I also feel that [illegible] of the elk habitat should be open for logging.

In todays society a strong elk herd is worth more economically to the State of Montana & the American people, than what will be [illegible] of logging [illegible].

In closing I feel that this area is a unique area and should be put in wilderness protection.

Thank You

William E Bryan
[illegible] Ave [illegible]
Billings Montana
5910[illegible]

103B

104A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15 I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as fa as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

Livestock need to be able to graze the area also. Men do not know how t balance the natural order of things, and it is not done so especially through wildnerness. The Bird refuge has not been enhanced by wilderness. It is a known fact that the birds will not feed and nest on the long, soured, un-graz grasses allotted to them from wilderness. They go to where the cattle have grazed and enjoy greater benefits there. Grazing and proper management on it will make it more productive than it already is.

I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

[illegible] - 20 Fern Lane
Charles L Bunnely 20 Fern Lane

105A

Phil Geyon, Project Manager
Butte District Office
Bureau of Land Management
Post Office box 3388
Butte, Montana 59702

Robert Burns
Post Office Box 1154
Ketchum, Idaho
83340

3 June 1987

Dear Mr. Geyon:

I'm writing to you to express my interest in the Centennial Mountains Wilderness draft E.I.S.

I wish to note that I respect the hard work you people have put into this sometimes thankless planning process, and I encourage you in the preferred alternative which would preserve 26,248 acres of this area as wilderness.

I've seen what damage often occurs to fisheries when development takes place upstream and desire that this be avoided here.

105B

Protecting this area as wilderness shall see to it that no harm comes to precious resources already set aside for the benefit of all, as is the case with Red Rocks Lakes.

Thank you for your time and interest.

Sincerely yours,

Robert Burns

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June 4, 1987

Mr. James A. Moorhouse
District Manager
U.S. Dept. of the Interior
Bureau of Land Management
Butte District Office
Butte, Montana

Dear Mr. Moorhouse,

Thank you for sending me the draft of the EIS on the Centennial Mountains Wilderness Study. I think it has been very well researched and presented. I put my vote in for Alternative # 2. Leaving this area as wilderness would provide more longterm recreational benefits to local communities than any of the other alternatives. The short term economic benefits suggested in the other alternatives (logging, mining) would soon turn this into an area that would be of little value to the human and other biological communities that interact with it. The report makes this obvious.

Sincerely,

Tom Caples

Tom Caples
48-30 39th Street
Long Island City, N.Y.
11104

107A

From: P.o. Box 402
Noxon, mt.
59853

6/17/87

Dear James Moorhouse,

I am writing to urge you to support a more comprehensive ecosystem alternative for a 92,000 acre Centennial Wilderness on both sides of the Continental Divide & to assess the relationship between the Centennials & the greater Yellowstone Ecosystem –

I appreciate that the Bureau of Land Management & Forest Service released a draft EIS calling for 26,248 acres of wilderness within the total 92,000 acre roadless area. This is a modest half-step in the right direction – Thank you – However, this limited proposal contains Mostly self-protected rock & cliffs within the existing BLM Primitive Area & adjacent Beaverhead Forest portion of the Mt. Jefferson RARE II Further Planning Area –

G-1

The rugged Centennials straddle the Continental Divide on the western edge of the Greater Yellowstone Ecosystem - This is one of the few east - west trending ranges in the west. These mts. are home to a significant interstate elk herd of 300 - 500 animals, & this remote country is also essential grizzly habitat.

One of the continent's few relic arctic grayling populations inhabits Upper Red Rock Lake on the adjoining Refuge Wilderness –

F-1

At stake also are the survival of the largest North American waterfowl - the majestic trumpeter swan & the endangered peregrine falcon –

Please, take a deeper look at this vital wilderness area & risk a full step forward in preserving the integrity of life existing there, thereby fulfilling your responsibility as a steward for planet earth –

In peace,

Maureen Carey

6/17/87

Dear James Moorhouse,

I am writing to urge you to support a more comprehensive ecosystem alternative for a 92,000 acre Centennial Wilderness on both sides of the Continental Divide & to assess the relationship between the Centennials & the greater Yellowstone Ecosystem –

I appreciate that the Bureau of Land Management & Forest Service released a draft EIS calling for 26,248 acres of wilderness within the total 92,000 acre roadless area. This is a modest half-step in the right direction – Thank you – However, this limited proposal contains mostly self-protected rock & cliffs within the existing BLM Primitive Area & adjacent Beaverhead Forest portion of the Mt. Jefferson RARE II Further Planning Area –

G-1

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One of the continent's few relic arctic grayling populations inhabits Upper Red Rock Lake on the adjoining Refuge Wilderness –

F-1

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Please, take a deeper look at this vital wilderness area & risk a full step forward in preserving the integrity of life existing there, thereby fulfilling your responsibility as a steward for planet earth –

In peace,

Maureen Carey

EDWARD CLEMENT
310 SOUTH ELLIS
SALISBURY NC 28144 18AM

Western Union Mailgram

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4-006313S169 06/18/87 ICS IPMMTZZ CSP HLEB
 7046338638 MGMS TDMT SALISBURY NC 59 06-18 0937A EST
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DISTRICT MANAGER BUTTE DISTRICT OFFICE OF THE
BLM
P O BOX 3388
BUTTE MT 59702

OUR FAMILY, WHO VACATIONS ANNUALLY IN S E MONTANA, STRONGLY SUPPORTS ALTERNATIVE 2 TO PROTECT RED ROCK LAKES REFUGE TO INSURE HABITAT FOR WILDLIFE INCLUDING THE ENDANGERED GRIZZLY AND TO RETAIN THE UNIQUE CHARACTER OF THE AREA THAT BRINGS US TO MONTANA
EDWARD CLEMENT

09:37 EST

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6/12/87

James Moorhouse - Dist. Manager

[illegible]

Yet the preferred alternative allows so much incursion for road-building, logging and commodity use.

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The DEIS at page 56 says the all wilderness alternative would basically be the best for such species as: elk, fishers, wolverine grizzly bear, lynx, accipiters, and spruce grouse!!! Further you admit that obviously this alternative would have "positive impacts on fishery, waterfowl and bald eagle habitat in the Centennial Valley."

The greater Yellowstone habitat for the grizzly bear is under intense pressure for human development, but the Centennial, including the Targhee N.F. portions provide a perfect opportunity to protect major habitat for numerous species without forgoing major, necessary mineral or timber resources

However, at P. 73, stated specifically is that any alternative but the all wilderness is going to "adversely affect" the area — not only visual values, solitude and naturalness

109C

but most importantly, critical wildlife habitat. I am upset, but not surprised that your decision is adverse to the facts — even those in your own supporting document.

I-4 The area also has such rare birds present as great grey owl, peregrine falcon (RRLNWR) — besides one of the few populations of artic grayling in the lower 48 states inhabit Upper Red Rock Lake — susceptible to adverse affects on the runoff and water table caused by roading and logging as well as mineral development.

The east west orientation of the range is nearly distinct in the West, and the area holds an abundance of rare and endemic plants, some which are threatened with loss of critical habitat.

The most major difficulties of the DEIS, in summary, are:

109D

F-2 ① No realistic assessment of the Centennial WSA and the Greater Yellowstone Ecosystem. No specific information about grizzly bear use or remnant populations is supplied — and your preferred alternative fails to give protection to these bears, timber wolves, or other important species of the ecosystem.

② The analyses of water quality, and its relation to the dependent valley area RRLNWR, is inadequate and subject to legal attack. No analysis sufficiently addresses the issues of fisheries, wildlife and waterfowl, especially Trumpeter Swans.

The effects of logging, road-building and overgrazing on a high, fragile habitat aren't acknowledged and analyzed for detrimental affects.

③ The Sheep Experiment Station should have been included for study — another potential area of litigation.

109E

④ The Targhee N.F. failed to adequately review their wildlands adjacent to the BLM acreage.

⑤ Again, no rational assessment of development affects on Montana's Species of Special Concern, is really done. Further, the assessment that degradation is inevitable under any but the All Wilderness alternative, is not heeded or followed in your preferred alternative.

I support a 92,000 acre Centennial Mtn Wilderness composed of both BLM & Forest Service land on both sides of the Continental Divide.

O-16 This area should include 10-12,000 acres of the "wildest" lands managed by the Agricultural Research Service on the Sheep Exp. Station.

To pass any administrative appeal, let alone legal review, this DEIS needs better evaluation of the impacts

109F

of types of developmental activities on scenic, wildlife, and recreational values. This area is so outstanding in these values compared to all our other unprotected wildlands, that it surely merits inclusion in the National Wilderness Inventory.

Most importantly, even if all the appropriate and outstanding acreage is not congressionally designated, the wildlife values of these areas must be protected from the most adverse affects of develop- with any multiple use decisions made on the "conservative" side - to make such to preserve these singular species, and habitats.

Please keep me on all mailing lists and send me your record of final decision and any amendments to the DEIS, and final EIS.

Sincerely, Jeffrey Cook
45025 E. Marmot Rd
Sandy, Or. 97055

June 19, 1987

James Moorhouse
District Manager
BLM
Box 3388
Butte, MT 59702-3388

Dear Mr. Moorhouse:

For the record, I would like to submit this short letter as comment on the Centennial Mountains Wilderness Study/DEIS.

I am very familiar with virtually all of the study area having hiked extensively along the crest of the Divide and up most of the drainages flowing north on the Montana/Red Rocks side. The study document is well organized and quite readable but, sadly, is deficient in several major ways:

F-3 *1) the analysis and recommendation for only 26,000 acres of Wilderness lacks consideration of the complex interrelationships between the Centennials wildlands and its role within the Greater Yellowstone Ecosystem;*

O-16 *2) none of the 8 alternatives presented include any portion of the 16,650 acre heart of the Centennials--the U.S. Sheep Station along the crest of the Continental Divide on the Montana side, even though enduring protection of these lands is critical to the Red Rock Lakes Refuge watershed and even though the transfer of jurisdiction in the 1981 Farm Act does not preclude consideration of this area for Wilderness designation; and*

3) obvious lack of participation by the Targhee Forest even though nearly one-half of the Centennials roadless resource is under its jurisdiction.

M-32 *With the above considerations in mind I want to indicate my personal support for the 92,000 acre Conservationist's Ecosystem Wilderness Alternative. I would not support this proposal if I felt that it would harm the local wood products industry. The truth is that the more productive timber lands on the western end of the study area are not suitable for logging and roading because of other resource values; ie. an important interstate elk staging area; and severe resource constraints; ie. highly erodable soils. For these reasons the costs of mitigation would most likely exceed the value of whatever timber there is.*

Nonmotorized recreation far exceed motorized recreation, both according to the study and based on my on use observations over the past ten years.

Livestock grazing is certainly compatible with Wilderness in terms of how such grazing is currently administered in the Centennials. Small timber sales are also appropriate in already accessed areas and in some lands which are perepheral to the Ecosystem boundary. Comprehensive protection of this remarkable wildlife/wildland area can indeed co-exist with traditional and reasonable resource extraction.

All of these uses are part of a western lifestyle which I and many other Montanans cherish. Thank you for considering these comments.

Sincerely,

Bill Cunningham

Bill Cunningham
15990 Mill Creek Rd
Frenchtown, MT 59834

110A

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May 24, 1987

Mr. Phil Gezon, Project Manager
Bureau of Land Management
P. O. Box 3388
Butte, MT 59702

Dear Mr. Gezon:

Please place this letter in the hearing record on your draft environmental statement concerning the Centennial Mountains.

As Montana residents, we feel your plans for the Centennials are inadequate to protect the important watersheds, wildlife and wilderness.

M-32 Let's face the facts. Timber and mineral resources are minimal in this highly scenic, recreational country next to Yellowstone Park. Wildlife values, including the threatened grizzly bear, are of high importance. You and the Forest Service even have to subsidize the timber industry to get it to cut the timber. This is at high taxpayers' expense, and we resent the use of our money for this purpose, especially when it also results in damage to watersheds, wildlife and wilderness.

O-16 The Targhee National Forest, which has the most wilderness to offer, hasn't proposed a single acre for wilderness protection! We ask that this situation be reversed, and that the Department of Agriculture also recommend including the Agriculture Research Sheep area in the wilderness.

In short, we strongly urge that you and the Forest Service revise your plans to recommend 92,000 acres of the Centennials as wilderness, as proposed by the conservation groups and others in Montana.

Sincerely,

C.R. Cunningham
Mrs C.R. Cunningham

Mr. and Mrs. C. R. Cunningham
S. E. 390 McCarthy Loop
Hamilton, MT 59840

112A

JUNE 15, 1987

JAMES MOURHOUSE
MANAGER, BUTTE DISTRICT
BUREAU OF LAND MANAGEMENT
P.O. BOX 3388
BUTTE, MT 59702-3388

DEAR MR. MOORHOUSE:

I AM WRITING IN REGARD TO THE CENTENNIAL MOUNTAINS WILDERNESS STUDY AREA AND ASK THAT THIS LETTER BE INCLUDED IN THE HEARING RECORD AND ENVIRONMENTAL STATEMENT ON THE STUDY AREA. THE BLM'S PROPOSAL TO RECOMMEND ONLY 26,248 ACRES AS WILDERNESS IS NOT LARGE ENOUGH. THE AREA THE BLM HAS RECOMMENDED FOR WILDERNESS IS MOST SELF PROTECTED ROCKS. WHILE THE LAND WITH THE MORE PRODUCTIVE WILDLIFE VALUES ARE LEFT UNPROTECTED.

F-3 THE TENTATIVE ENVIRONMENTAL STATEMENT IS DEFICIENT IN THAT IT FAILS TO ASSESS RELATIONSHIPS BETWEEN THE CENTENNIAL WILDERNESS STUDY AREA AND THE GREATER YELLOWSTONE ECOSYSTEM. O-16 THE 16,650 ACRE SHEEP EXPERIMENT STATION IS THE CORE OF THE STUDY AREA AND HASN'T BEEN CONSIDERED IN THE EA. I RECOMMEND THAT THE BLM PROPOSE 92,000 ACRES OF THE CENTENNIALS WILDERNESS TO PROTECT THIS UNIQUE AREA FOR GENERATIONS TO COME. ⟶

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-2-

THIS WILL ALSO HELP PROTECT THE RED ROCK LAKES REFUGE WHICH IS SO IMPORTANT TO THE TRUMPETER SWAN.

SINCERELY,
John Earl Daggett
JOHN DAGGETT

113A

P.O. Box 202
Bozeman, MT 59715

June 17, 1987

District Manager
Butte Dist. Office - BLM
Box 3388
Butte, MT 59702

Dear District Manager,

I would like to take this opportunity to comment on the Draft EIS for the Centennial Mountains Wilderness Study Area. I would like this to go on record as being opposed to the mere 26,248 acres being proposed for wilderness and I would like to see 92,000 acres become designated wilderness.

F-2 The Centennial Mountains are an important part of the Greater Yellowstone Ecosystem. Many of the birds and mammals in the Centennials (such as wolverine, lynx, and prairie falcon) are a part of a larger population that use much of the adjacent Park land. Some of the Yellowstone grizzly are documented to use the Centennial area. Disturbance sensitive species such as these cannot afford to lose any more habitat. You have a social obligation to protect these animals.

I would urge that both sides of the Continental

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divide be considered for wilderness status to include the Idaho side to preserve elk winter & lower elevation ~~winter~~ summer range.

O-16 I think that the DEIS should include an analysis of the Sheep Experiment Station for wilderness status. The station is located in the center of the Centennials and is a key area that deserves wilderness protection.

The DEIS failed to include an evaluation of the impacts of development on wildlife, recreation, and scenic values in the Centennials. The ecosystem is being picked apart bit by bit by development, mining and logging (to name a few) so it is critical to cumulatively assess these impacts on the animals, habitat and environment.

I-1
I-2 I personally am very concerned about the dramatic increase of soil erosion caused by logging on steep, unstable, highly erosive soils - such as those on the western end of the range. The water quality of the eco-system must be protected to help ensure the survival of the arctic grayling, trout, and trumpeter swan that inhabit the Red Rocks wildlife ~~area~~ Refuge and surrounding areas.

Thank you for this opportunity to comment.

Sincerely,
Susan Dejmal
SUSAN DEJMAL

JUN 1 9

114A

421 Westridge Drive
Bozeman, MT 59715

Mr. Bill Gezon
Project Manager
Bureau of Land Management

Subject: Wilderness in the Centennial Mountains

Dear Mr. Gezon:

I write you to oppose any wilderness designations in the Centennial Mountains. In my opinion, there is no justifiable reason for wilderness designations in Montana at this time. To support this opinion my arguments are as follows:

1. Montana has extensive wilderness already.
2. Trends in Montana wilderness use show drastic declines in recent years (see attached).
3. At present there is a surplus of recreational opportunity in Montana in all catagories, with no expected change in the condition during the foreseeable future.
4. The area has potential to provide resources that would bolster local economic conditions, including a large standing inventory of timber.
5. Recent surveys of Montanans show that, while they support the wilderness concept, less than 30% of residents favor any further wilderness additions.[1]

Since Montana is clearly in need of jobs at present, and we possess an over supply of primitive recreation opportunity, I oppose any further wilderness additions. I support alternative #3 for the Centennial Mountains - the no wilderness alternative.

Sincerely yours,

Jerry Furtney
Jerry Furtney

Enclosure

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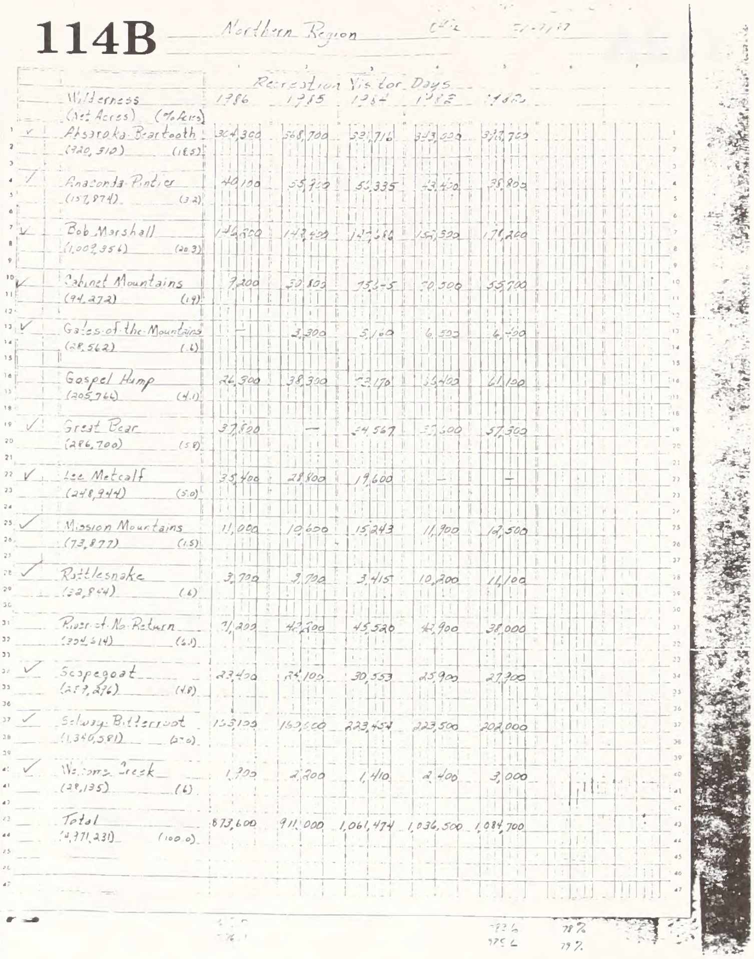
[1] Susan S. Wallwork, "Montanans and Selected Wilderness Issues," Montana Business Quarterly, 22, no. 4 (1984): 15-18.

114B



Northern Region

	Wilderness (Net Acres) (% Acres)	Recreation Visitor Days 1986	1985	1984	1983	1982
✓	Absaroka Beartooth (920,310) (18.5)	304,300	368,700	321,716	333,000	318,700
✓	Anaconda Pintler (157,874) (3.2)	40,100	55,700	53,335	43,400	35,800
✓	Bob Marshall (1,009,356) (20.3)	144,800	143,400	147,686	155,300	176,200
✓	Cabinet Mountains (94,272) (1.9)	7,200	30,800	35,3-5	30,500	55,700
✓	Gates of the Mountains (28,562) (.6)	—	3,300	5,160	6,500	6,400
	Gospel Hump (205,766) (4.1)	26,300	38,300	53,170	53,400	61,100
✓	Great Bear (286,700) (5.8)	37,800	—	54,567	57,600	57,300
✓	Lee Metcalf (248,944) (5.0)	35,400	28,800	19,600	—	—
✓	Mission Mountains (73,877) (1.5)	11,000	10,600	15,243	11,900	12,500
✓	Rattlesnake (32,844) (.6)	3,700	9,700	3,415	10,300	11,100
	River of No Return (304,614) (6.1)	71,200	42,200	45,526	42,900	38,000
✓	Scapegoat (257,276) (4.8)	23,400	24,100	30,553	25,900	27,900
✓	Selway Bitterroot (1,340,581) (27.0)	153,100	163,500	223,454	223,500	202,000
✓	Welcome Creek (28,135) (.6)	1,700	2,200	1,410	2,400	3,000
	Total (4,971,231) (100.0)	873,600	911,000	1,061,474	1,036,500	1,084,700

78%
79%

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May 24, 1987

Mr. Phil Gezon
Bureau of Land Management
P. O. Box 3388
Butte, Montana 59702

Dear Sir:

This is to comment for the record on your hearing concerning the draft environmental statement on the Centennial Mountains.

As prospectors and mineral developers, we know the value of our merchantable resources. But we feel in the past we have abused the lands that were acquired for us by our forefathers.

Weighing the resource value and the value of the native habitat of this area for fish, wildlife and roadless recreation, we feel as though this area should be left untouched. Let's not make the same mistake we have made in the past.

We therefore ask that you recommend 92,000 acres of the wild Centennials for wilderness.

Sincerely,

David A. Gabriel
Carole A. Gabriel

Gabriel Prospecting & Mineral Development
199 Shelly Road
Helena, Montana 59601

116A

P.O. Box 202
Bozeman, MT 59715

9 June 1987

Mr. James Moorehouse
Bureau of Land Management
P.O. Box 3388
Butte, MT 59702-3388

Dear Mr. Moorehouse:

I would like to comment on the BLM/USFS wilderness proposal for the Centennial Mountains Wilderness Study Area. Please include this letter in the hearing record and environmental statement.

During the past four years, I have worked as a wildlife biologist in southwestern Montana. I have had the opportunity to study wildlife species that reside in, and rely upon, the unique wildlands of this region. I am disturbed by the widespread destruction of wildlife habitat that I have seen and learned about.

I do not support the U. S. Forest Service's "timber quota" approach to forest management, I do not believe that sustained timber yield is a realistic goal for this region, and I do not support the extensive road-building and timbering practices of the Forest Service. These practices simply do not make sense ecologically or economically.

F-2 For these reasons, I support the Conservationist's Ecosystem Alternative for a 92,000 acre Centennial Mountains Wilderness, and I urge you to revise the current wilderness proposal. In particular, my concerns are as follows: 1) that the critical relationship between Red Rocks N.W.R. and the watershed that feeds the refuge is not degraded by the impacts of road-building and logging; G-1 2) that critical grizzly bear habitat within the area is not degraded; 3) that valuable elk winter range and migration routes in the northwestern portion of the wilderness study area are not destroyed; and 4) that

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F-1 sensitive wildlife species such as moose, trumpeter swans, and peregrine falcons are not impacted by further development activities in the area.

The incredible wildlife habitat that occurs in the Centennial Mountains Wilderness Study Area is vital to the health of the local area and to the Greater Yellowstone Ecosystem. Protection of anything less than the total Wilderness Study Area would represent irresponsible resource management.

Sincerely,

Steven D. Gehman

Steven D. Gehman

117A

June 7, 1987

Mr. James Moorhouse
Butte District - BLM
Box 3388
Butte, MT 59702-3388

Dear Mr. Moorhouse,

Please enter these comments into the public hearing record regarding the Centennial Mountain Wilderness EIS.

I urge the BLM to designate a 92,000 acre wilderness area including both sides of the Centennial Range. The alternative proposed which leaves out the Idaho side from wilderness designation is unacceptable. Wilderness for the Centennials is necessary to protect water quality and provide a sanctuary for wildlife species which are part of the Greater Yellowstone Ecosystem.

Wilderness will allow the Centennials to again become part of an undisturbed, functioning ecosystem. The Targhee National Forest Plan is riddled with management language allowing the Forest Service to cut trees to manage insect and disease outbreaks. As wilderness, these entities, along with fire, will be assured of regaining their natural role in the Centennials.

The Centennial EIS does not fully document all the impacts to resoures by development if the area is not designated a wilderness. The resources in the Centennials are too precious to gamble with. Wilderness designation is the only means by which the features now found in the Centennials will be perpetuated.

Sincerely,

Craig J. Gehrke

Craig J. Gehrke
P.O. Box 1271
Boise, ID 83701

118A

June 13, 1987

Barb Berges
503 S. Center
Miles City, MT 59301

BLM-Butte District Office
P.O. Box 3388
Butte, MT 59702

Dear BLM,

Designating land as wilderness is not as unacceptable as I would hope [illegible] or as certain miners/timber companies complain it is. On the other hand, opening lands to development and mining of minerals, vegetation and other resources is irreversible and then will [illegible] other resources [illegible] wilderness in those I have heard never, by definition, [illegible] reading the EIS.

Also, I understand [illegible] of the Centennial Mountains development, timbering, of the Centennial Mountains [illegible] the Red Rock Lakes N.W.R. which would adversely affect the [illegible] that these were negligible. It seems to me [illegible] return on resource development, [illegible] to what [illegible] Natural resource developers often [illegible] which they [illegible] enjoy the pristine environments [illegible] Red Rock Lakes [illegible] (I should know!) [illegible] not letting the rest of us enjoy it.

[illegible] set aside as much wilderness as possible [illegible] [illegible] [illegible]

Sincerely,

Barb Berges

PS [illegible]

119A

16 May 1987

James Moorhouse, District Manager
Butte District-BLM
Box 338B
Butte, MT 59702-3388

Mr. Moorhouse:

I-1 The Wilderness Suitability Study and Draft Environmental Impact Statement (DEIS) for the Centennial Mountains Wilderness Study Area (CMWSA) are inadequate to insure the protection/conservation of this unique area. Not only are trumpeter swans at risk with mandated development, but other species of special concern, such as the grizzly bear and bald eagle in addition to scenic, recreational and other wildlife values.

F-3
F-6 The DEIS fails to provide for the assessment of the critical relationship between the CMWSA and the Greater Yellowstone Ecosystem (GYE). We have shown a link, through band recoveries and sightings of colormarked birds, among habitats in the CMWSA and other areas in the GYE which may be essential for survival of the nonbreeding segment of the GYE bald eagle population. Continued degredation of habitat within the CMWSA as a result of domestic livestock grazing, mining, and logging may seriously impair the recovery of bald eagles in the GYE.

O-16 I urge agency support for a more comprehensive ecosystem alternative for a 2,000-acre Centennial Mountains Wilderness on both sides of the Continental Divide and analysis of impacts ecosystem wide. I also urge BLM and US Forest Service to revise the DEIS to include analysis of lands owned by the Agricultural Research Service on the Sheep Experiment Station.

More stringent protection of water quality in the CMWSA is essential. Already trumpeter swan and other waterfowl populations along with unique fisheries are being negatively impacted. Bald eagle habitat may also be affected.

I hope your agency and others will correct the serious deficiencies in the DEIS to insure the conservation of the unique and valuable resources in and around the Centennial Mountains.

Regards,

Alan R. Harmata, Ph.D.
4756 Itana Circle
Bozeman, MT 59715
406-586-3747

120A

2235 Skyway
Butte, MT 59701

BLM
Butte District Office
Box 3388
Butte, MT 59702

5 June 1987

Dear Sirs;

I have carefully read the Centennial Mountains Draft Environmental Impact Statement and it is my opinion that Alternative 2 should be chosen.

It would seem to me that any further so called "development" in the area would result in unacceptable damage to wildlife and to the Red Rock Lakes and the National Wildlife Refuge.

Thank you for considering my opinion.

Mortimer L. Hart

121A

CHARLES M. HAUPTMAN
GEOLOGIST
449 Hart Albin Bldg.   Telephone (406) 252-3685
BILLINGS, MONTANA 59101

April 29, 1987

District Manager
Butte District Office - BLM
P.O. Box 338B
Butte, MT 59702

Re: Draft - Cenntennial Mountains Wilderness Study/Environmental Impact Statement

Dear Sir:

I hereby express my disagreement with your choice of Alternative 1 as the proposed action. I strongly urge Alternative 3, No Wilderness, as the proper action, for reasons upon which I will expand.

First, the present management plan for the lands under study, whether the plans are under the aegis of either the Forest Service or the BLM, are already severely restrictive concerning human usage of the lands. Some multiple usage is, however, allowed. As the subject draft EIS states, those management plans include strict stipulations to protect the various environmental concerns.

Second, the subject lands contain sufficient mineral potential, mostly untested, that removal from possible development would have a substantial impact on the economy of the area. When bureaucrats admit that the economic potential is "moderate", I suspect that the potential is really quite good.

Third, I consider the delineated wilderness proposal under Alternate 1 illogical and capricious. Not only are the proposed wilderness lands gerrymandered about in a ridiculous narrow strip often less than a half a mile wide, the choice of lands is apparently also determined by which federal agency administers the land. BLM administered land seems to be much more suitable for wilderness than Forest Service land. This is a scientific approach? Hardly. Folks on the Pacific slope might also take umbriage at the government's perception that land west or south of the Continental Divide is less desirable as wilderness.

Finally, the cost of this wordy compendium, with its many facts and equal numbers of speculations and suppositions, is bad enough without a lot of "gussying up" to make the document more palatable. I refer to the copious use of art work, some of which isn't bad, and fancy colored maps. As a taxpayer, I contend that the considerable expense of salaries, time and extra printing costs are unnecessary and wasteful.

Very truly yours,

C. M. Hauptman

CMH/am

122A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15

I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as fa as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

Livestock need to be able to graze the area also. Men do not know how t balance the natural order of things, and it is not done so especially through wildnerness. The Bird refuge has not been enhanced by wilderness. It is a known fact that the birds will not feed and nest on the long, soured, un-graz grasses allotted to them from wilderness. They go to where the cattle have grazed and enjoy greater benefits there. Grazing and proper management on it will make it more productive than it already is.

I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

Archie Hayden
4850 [illegible] Ln
Dillon Mont 59725

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

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Thank You

[illegible]
4850 [illegible]
Dillon, Mont 59725

123A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15

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Thank You

Ray Hildreth
115 Fern LN.
Dillon Mont.

Darlene Hildreth
115 Fern Ln
Dillon, Mt 59725

JUN 2 2 87

124A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15

I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as fa as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

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I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

Wendy Hildreth
[illegible] Hildreth
10 Christine Lane
Dillon, MT
59725

125A

Donna & Keith Hodges
1489 Buffalo Rd.
Helena, MT 59601
June 16, 1987

Bureau of Land Management
P. O. Box 3388
Butte, Montana 59702

Dear Sirs:

We have read your draft Environmental Statement and Proposal for the Centennial Mountains and wish to express our views. Please make them a part of the official hearing record.

We strongly support the BLM recommendation of wilderness for nearly all of the Primitive Area, as well as the Beaverhead proposal for 4,4000 acres of wilderness in the Jefferson unit.

But we feel the Forest Service made a big mistake in not proposing wilderness, also, for at least 42,000 acres of adjoining wild lands in Idaho's Targhee National Forest. The timber here is mostly poor, and timber harvest would have to be heavily subsized by the Forest Service at taxpayer's expense. Road construction and logging would damage the watersheds and water quality, while destroying habitats of elk, moose, grizzly bears and other wildlife. We don't want our taxpayers' money spent for that!

O-16 The ARS Sheep Station is the central part of these rugged and spectacular Centennial wild lands and should be a part, along with acquired State lands, of a 92,000 acre Centennial Mountains Wilderness.

As Montanans, we have visited and viewed the Centennial country a number of times and feel it is best suited for maximum wilderness.

Yours truly,

Donna & Keith Hodges

126A

May 6, 19B7

District Manager
Butte District Office of the BLM
P.O. Box 33BB
Butte, MT 59702

Dear Sir:

I am writing in regard to the Centennial Mountains Wilderness Study/Environmental Impact Statement.

I am not sure why I was sent the Environmental Impact Statement, unless it is because I belong to several environmental/conservation organizations. Whatever the reason, thank you for the opportunity to make comments on this issue.

After careful study of the impact statement, although I prefer Alternative 2, I have decided to recommend Alternative 6. I feel that this Alternative would better protect the wildlife habitat, the water shed to Red Rocks better than Alternative 1 and snowmobilers and ranchers who now use the area will still be able to use it.

I believe the BLM, and the Forest Service should work with Representative Pat Williams and Senators Baucus and Melcher to protect, with wilderness designation if possible, all the remaining roadless, wild land in Montana.

Sincerely,

Mrs. William V. Immonen
1641 Gilman
Butte, MT 59701

127A

Box 413
Big Sky MT 59716
5-26-87

Dear Mr. Gezon,

The following are my comments concerning the Centennial Mountains Wilderness Draft Environmental Impact Statement:

I-1
I-2
J-3
The DEIS does not adequately address protecting the water quality essential for survival of trout, arctic grayling, trumpeter swans and other waterfowl. Levels of erosion and slumping increasing on 23% of the study area when development activities occur should not be an acceptable alternative.

F-3 The DEIS does not adequately assess the Centennials relationship within the Greater Yellowstone Ecosystem. Of particular concern is how proposed developments, utilizing the timber resource, and range resource will impact the grizzly population and other "Species of Special Concern": wolverine, lynx, hoary marmot, great grey owl, goshawk, sharp skinned hawk, Coopers hawk, golden eagle, prairie falcon, and long-eared owl.

O-16 The DEIS failed to study the wilderness potential of the Sheep Experiment Station lands. This is a major shortcoming.

Over 57% of the study area is in the Targhee National Forest, yet none of the acreage recommended for Wilderness status is in the Targhee N.F.. This is a strange discrepancy;— did the Targhee N.F. ever seriously consider recommending any of it's lands for Wilderness status?

I support Wilderness designation for the 72,855 acres in both Montana and Idaho (Alternative 2) as well

---

127B

2

O-16 cont. as the 16,650 acres of the Sheep Experiment Station. Please revise the DEIS, including analysis of these lands administered by the A.R.S.

J-3 Please revise the DEIS to include more detailed analysis of soil erosion and water quality.

Please revise to evaluate developmental impacts on wildlife populations, recreational, and scenic values. Protection of these resources must be more adequately addressed.

I would appreciate a reply from either the BLM or the Forest Service.

Sincerely,

Don B. Jackson

128A

Date: May 30, 1987

From:
Robert N. Jones
233 South 1100 East #4
Salt Lake City, Utah 84102

To:
James Moorhouse, District Manager
Butte District - BLM
Butte, Montana 59702

Re: Centennial Mountains DEIS

Dear Mr. Moorhouse:

I am writing to urge you to enlarge the proposed Centennial Mountain Wilderness to a 92,000 acre unit, on both sides of the divide. The recommended acreage in the draft EIS is much too small, and does not address the best interests of the ecosystem.

Water quality, threatened and endangered species, and the
best use of the land is better addressed in the all wilderness
alternative, including all suitable acreage within the U.S. Sheep
Experiment Station. Timber welfare does not constitute
appropriate use of my public land. As is typical of the F.S. and
K-3 particularly the BLM, mitigation of degradation of logging,
roading, and other intrusion is inadequately addressed; economic
M-6 analyses do not appropriately include the true costs of multiple
abuse of my public land in the Centennials.

O-16 Public land within the sheep station should be included within the wilderness inventory, and subsequently recommended for official wilderness status. If I had my preference, no unroaded areas would be considered for roading/logging/mineral exploration. Would your agency honor this refusal to participate in development, as the Agricultural Research Service has refused to participate in the wilderness study of my land?

How does the Targhee justify its refusal to seriously consider any of the Idaho side land as potential wilderness acreage? Since I have a long history of disgust with the timber lobby efforts of the Targhee, perhaps I should not be surprised with the above result. However, I continue to remind the Targhee that their 'private timber reserve' actually belongs to the public. Please communicate my continued lack of enthusiasm about their timber baron status to the Targhee.

Being a long-time Idahoan who has hunted and hiked many days and miles in the Centennial Mountains, I strongly support recommendation of the all wilderness alternative (on both sides

128B

of the divide) for the Centennial Mountains. Please keep me advised of your efforts to see my public land appropriately managed as wilderness. Thanks.

Rob Jones
Rob Jones

129A

6/4/87

District Manager
Butte District Office
BLM, box 3388
Butte, Mt. 59702

Dear Sir

I am familiar with only the West end of the Centennial Mountains on the Idaho side, a result of several hikes from the roads to the ridge tops. I found the area very nice, hiking through country with many springs and brroks.

M-32 I do not believe that the Bureau can improve on the scenic value of this country with any of their land use plans. Certainly not by logging, mining, additional grazing, road building, or any other multiple use (or abuse) plans. Therefore, why not leave this area "as is". Benefits would include a very nice outdoor area, a cost savings to the public by eliminating wasteful and subsidized logging and road building, a legacy for the future, and something the Blm could be proud of.

At this time, I would encourage the BLM to include the western region of the planning area into the wilderness area, and to also include additional contiguous areas as recommended by the Wilderness Society and other speakers at this meeting.

Thank You
K R Katsma
Kenneth R. Katsma
1863 Rainier
Idaho Falls, Id 83402

FOR HEARING IN IDAHO FALLS, 6-4-87, THAT I MISSED)

130A

8715 John Dower Rd. S.W.
Tacoma, Wa 98499
June 15, 1987

James Moorhouse, District Manager
Butte District - BLM
Box 3388
Butte, MT 59702

Dear Mr. Moorhouse:

I am writing in reference to the Centennial Mountains Wilderness study area. I am a resident of the state of Washington but I was born in Idaho and was raised in Idaho and Montana. I consider the Centennial Valley my first home. My family maintains a ranch in the Centennial Valley on land that my grandfather worked very hard to obtain. My family has been a part of the Centennial Valley for over 60 years. We work on the land and treasure all it has to offer.

I visit the Centennial Valley as often as I can. The land in the

130B

Valley is still in a natural state, undeveloped and undamaged. On my visits to the valley I enjoy the waterfowl, the majestic trumpeter swans, the elk, moose, deer, eagles, sandhill cranes and the many other wild animals. Walks through the trees and plants looking at the wildflowers is a pleasure. Water that flows clear, clean and unpolluted is a welcome sight.

It's because of all these aspects that I believe preservation and protection of the land and its resources in the Centennial Valley is a must.

I support an alternative plan for the Centennial Mountain Wilderness that includes both sides of the Continental Divide.

Sincerely,

Elizabeth Scheid Kessell

131A

8715 John Dower Rd. S.W.
Tacoma, WA. 98499
June 15, 1987

James Moorhouse, District Manager
Butte District - BLM
Box 3388
Butte, MT 59702-3388

Dear Mr. Moorhouse

Although my association with the Centennial Mountains Wilderness Area spans a short period of time I have none the less been touched by the overwhelming beauty, solitude and serenity it holds. I recently married into a family that has owned property in this area for more than a half century. This has proved to be to my good fortune in many ways; one of which being my privilege to enjoy one of the few remaining areas saved from the degradation of development. Being a native of the State of Washington, I have witnessed the rapid decline of many areas that in the past represented the grandeur of the Pacific Northwest. There are many examoles here of the adverse consequences associated with the lack of protection of our natural resources. Recently a timber cutting operation negligently caused a massive fish kill in the Olympic forest while constructing logging roads. As I read the summary of the proposals my awareness of tragedies such as this motivates me most to speak out on this critical issue.

O-16

Unfortunately we often do not realize the importance of something until after it is gone. Collectively we can have the foresight to prevent this from happening here. This special area that is essential to so many species of plant and animal life and has magnificent natural recreation and scenic values deserves the utmost protection from the impacts of development. For the sake of the endangered wildlife, the quality of water and those of us that hope to enjoy the Centennial Mountains Wilderness Area for many years to come, I urge you to support the more comprehensive all wilderness (92000 acre) plan and in addition include the Sheep Experiment Station.

Sincerely

Joel H. Kessell

132A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15

I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as fa as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

Livestock need to be able to graze the area also. Men do not know how t balance the natural order of things, and it is not done so especially through wildnerness. The Bird refuge has not been enhanced by wilderness. It is a known fact that the birds will not feed and nest on the long, soured, un-graz grasses allotted to them from wilderness. They go to where the cattle have grazed and enjoy greater benefits there. Grazing and proper management on it will make it more productive than it already is.

I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

[illegible] E Keyes
[illegible] H. Keyes
125 [illegible] Lane
Dillon, Mt 59725

JUN 2 2

133A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

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Thank You

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

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Thank You

134A

M-15

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

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I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

Margaret Lakner
Margaret Laknar

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

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I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

LARRY LAKNAR

135A

BLM - Butte District Office
PO Box 3388
Butte, Mt 59702

Re: EIS on Centennial Mountains

Dear Sir:

As an avid birder and outdoor enthusiast, I am writing to express my support for wilderness designation for the superlative Centennial Mountains. In particular I support the proposal of conservationists to designate a wilderness of 97,000 acres inclusive of lands on the US Department of Agriculture's experimental station range.

The value of the Centennial Valley to the nation lies most particularly in its vital role for the maintenance of the trumpeter swan population. Without the protection afforded by wilderness, the vital

135B

watershed of the Red Rocks will be damaged with the loss of the trumpeter swan's habitat. Narrowly focused development interests should not be allowed to proceed develope the area and cause the trumpeter swan to become an endangered species in the Northern Rockies.

Thank you for considering my comments in this matter.

Sincerely;

Cary B Lund

P.O. Box 283
Helena Mt
596034

136A

JUN 1987
RECEIVED

June 17, 1987

Box 763
Dillon, Mt 59725

Bureau of Land Management
Dillon District
Dillon, Mt 59725

Dear Sir.

I am writing in regards to the Centennial Mountain management issue and I would like for my comments to be included in the official record.

M-15 The Centennial Range is one of the richest areas in natural resources (both extractable and on-site) in the whole Beaverhead area. It contains valuable minerals, the highest tree growing potential within the range of the Dillon Sawmill, a great forage reserve, and wildlife & recreation potential. These are the very uses upon which the Dillon economy was built and continues to thrive. They must continue to be available for use, if that economy is to remain stable. I therefore oppose wilderness status for the Centennial Mountain (also primitive area status, or special management to protect endangered species which would be introduced) on the grounds that it is not the best use for the area and would be detremental to current and future uses.

136B

The Centennial Mountains are very remote, inaccessible for most of the year, and distant from population centers.

O-21 The "wilderness definition" does not apply to a great deal of the study area because of historic uses and size and corridor intrusions. The country, while decidedly scenic, offers no special ~~amen-~~ Character- istics ~~ities~~ which cannot be found in many other recreation areas in the West. There is no evidence of grizzly or wolf population (although the rumor currently circulates that wolves may have been secretly transplanted in or near there by an unauthorized agency or organization) in the area, ~~and~~ making such habitat management a moot excuse for wilderness protection. I therefore oppose wilderness status for the Centennial Mountains (or primitive area or special management) based on the fact that it does not meet requirements, would not make a significant contribution to the wilderness system, and cannot offer habitat to existing threatened or endangered species.

136C

The issue of erodability of Centennial watersheds is one that I find very interesting. It is quite probable that current sediment loads are less than those which historically occurred in the Centennial under "no management" ~~or~~ (before human impacts). The flat valley fill deposits and slumpy terrain suggest that the valley and surrounding landscape was formed by sediment movement, probably extreme at times. Current technology enables use of the extractable commodities with less sedimentation than that which historically occurred here. Wilderness management opens the door for large-scale denudation by wildfire or bug infestation and catastrophic mudslides and sedimentation (re: Gates of the Mountain "Wilderness" where, following wildfire, a tremendous amount of money was spent flying grass seed to "protect" a trout stream! Wilderness? HA!)

136D

I therefore challenge the opinion that wilderness will protect the water quality in the Red Rocks Lakes. I believe that the quality presently enjoyed there is a human creation — far from natural.

I am firmly opposed to any designation in the Centennial Mountains which would preclude timber harvesting, mining, grazing, or recreation.

Thank you for your consideration.

Miriam I. Lyngholm

138A

Mollie Matteson
210 North Second East
Missoula, Mt. 59801

BLM-Centennial Mts. Wilderness Proposal
Butte District
Butte Montana

Dear BLM:

The following are my concerns about your draft Centennial Mountains Wilderness Study/EIS statement.

I support your alternative 2 which calls for the creation of a 72,885 acre wilderness. The area is highly scenic, critical wildlife habitat for elk, and perhaps an occasional grizzly and protect the watershed of the Red Rock Lakes Wildlife Refuge. The region's admitted highly erodable soils makes timber harvest questionable.

There are few present conflicts and wilderness designation for the entire area seems appropiate.

Sincerely:

Mollie Matteson

DEAR SIR -

I AM WRITING THIS TO ASK THAT YOU CONSIDER A BROADER-SCALE, MORE COMPREHENSIVE ECOSYSTEM ALTERNATIVE FOR AROUND RED ROCK LAKE. THE WILD COUNTRY IN THE CENTENNIAL MOUNTAINS IS ESSENTIAL TO THE BEST BENEFIT OF THE RED ROCKS NATIONAL WILDLIFE REFUGE.

THE WILDLIFE IN THE REFUGE DEPEND ON CLEAN SILT-FREE WATER IN THE SHALLOW MARSHES.

PLEASE CONSIDER LETTING THE TOTAL 92,000 ACRE ROADLESS AREA, STRADDLING BOTH SIDES OF THE DIVIDE, REMAIN AS WILD AS IT IS NOW.

THE RELATIONSHIP BETWEEN THE CENTENNIAL MOUNTAINS AND THE GREATER YELLOWSTONE ECOSYSTEM IS ONE THAT CAN ONLY BE DAMAGED BY FURTHER ROADING & DEVELOPMENT.

THANK YOU

137A

139A

1305 - 2nd Ave. North
Great Falls, Montana 59401
June 17, 1987

James Moorhouse, District Manager
BLM Butte District
P. O. Box 3388, Butte, Montana

Dear Sir:

I am concerned about the draft EIS for the Centennial Mts Wilderness Study Area, which recommends only 26,000 acres.

This ecosystem, on both sides of the Continental Divide, is essential for the preservation of the Red Rock Lakes National Wildlife Refuge. Any development here--mining, over-grazing, ORV use--will further the siltation of the refuge because of the unstable soils.

We need a 92,000 acre Centennial Mountain Wilderness in order to preserve this beautiful wildlife area. Let's consider the fate of the trumpeter swan, the peregrine falcon, the sandhill crane, and all the other birds in this area. They need a place to live, too.

Sincerely yours,

Carley McCaulay

Carley McCaulay

140A

P. O. Box 917
Kalispell, Mt. 59903

May 30, 1987

Mr. James Moorehouse
Bureau of Land Management
P. O. Box 3388
Butte, Montana 59702-3388

Dear Mr. Moorehouse:

I wish to voice my support of the Concervationists' Ecosystem Alternative. This would provide a magnificent 92,000 acre Centennial Mountains Wilderness for this wild Centennial Mountain area, instead of allowing the area to be roaded and logged.

The gain from wilderness use by present and future generations will be much greater in comparison to the small monetary return from logging.

Please include this letter in the Hearing Record.

Yours truly,

Malcolm S. McLelland

141A

4780 Clearview Avenue
Pocatello, ID 83204

June 18, 1987

James Moorehouse
District Manager
Butte District BLM
Butte, Montana 59702

Dear Mr. Moorehouse:

Please accept the recommendations contained in this letter. They concern the Centennial Mountain's Wilderness Area Study.

I am puzzled by your lack of attention to the obvious need for wilderness. Your limited inclusion appears to stem from an opinion that much of the area under consideration is of less than wilderness quality. However, rather than assume that stance, why not consider what could happen to further degrade the area if wilderness status is NOT achieved?

Please recommend that all-wilderness alternative, with the addition of the Sheep Ranch. That 17,000-acre parcel should be a part of the protected area. The adverse affects of selecting alternative I would be something your agency would have to live with far into the future. Why not pay attention to public concern and:

1. Increase the wilderness area to include both sides of the Continental Divide;
2. Address the impact on animal life, water quality, and recreation and scenic values;
3. Protection of resources for future use (that should ring some sort of bell with you guys).

Thank you.

Sincerely,

Kay

Kay Merriam
4780 Clearview

KM:jmf

142A

Don Merritt
713 Poplar
Helena, MT 59601
June 17, 1987

District Manager
Bureau of Land Management
P. O. Box 3388
Butte, Montana 59702

Dear Sir:

I am writing you in regard to your tentative wilderness proposal for the Centennial Mountains, since I will not be able to attend one of your hearings on the subject.

Please include this letter in the hearing record.

I think the BLM did a fine job in recommending 21,774 acres of the Centennial Primitive Area as wilderness. I support that. But the Forest Service did very poorly in proposing only 4,474 acres of wilderness, and all of that in the Beaverhead Forest.

There are over 42,000 acres of wild country on the Targhee Forest in Idaho, next to the Centennial Primitive Area, and the Forest Service should propose all of it for wilderness.

O-16 Also, the undeveloped Sheep Station should be proposed for wilderness.

After all, the Targhee Forest says it does not plan to develop most of these wild acres. And neither will the Sheep Station be developed. So what is keeping them from proposing wilderness for both? Making it wilderness will best keep this beautiful mountain country always wild. It needs to stay wild as home for the moose, elk, grizzly bear, grayling, trout and trumpeter swan.

I urge that the BLM and the Forest Service redo their proposal and recommend some 92,000 acres as the Centennial Wilderness.

Sincerely,

Don Merritt

Don Merritt

143A

June 8th,1987

Mr. James Moorhouse, Mgr.
Butte District, BLM
P.O. Box 3388
Butte, Mt. 59702

Dear Mr. Moorhouse,

I was unable to attend the recent hearing on the Centennials, but I would like to be on record for protection for this area.

Some years ago I had the opportunity to visit the core of the Centennial Mountain Wilderness and I as most impressed with the sheer beauty of the subalpine parklike country.

I am not at all happy or satisfied by the agency recommendation of some 26,248 acres leaving nearly 75% of this great wild area with no "future." Given the poor quality timber in the area, and the few operable mineral deposits, it is difficult to understand the reluctance of the agencies to recommend an area of meaningful size, namely 92,000 acres in Montana and Idaho.

This country has moose, elk, peregrine falcon-an endangered species- and an occasional wolf. It is really impossible to separate the life community of the Red Rocks Lakes National Wildlife Refuge from the adjoining Centennial Mountain Wilderness Study area. The dramatic 3,000 foot uplife of the Centennials forms the critical watershed for the refuge on the valley floor. Any development of the steep, extremely unstable soils could irreversibly degrade the refuge, its water quality, and rich array of wilderness-dependent wildlife.

I urge you to do what you can to get the BLM- Forest Service proposal revised. You will be doing the citizens of this country-many of whom have not yet had an opportunity to visit Red Rocks or the Centennials- a real servcie. A service of which you will be proud for the rest of your life!

Sincerely,
Doris Milner
NW 75 Ricketts Rd
Hamilton,Mt 59840

Please enter this into the hearing record.

144A

L M Minich
P.O Box 4645
Butte, MT
59702
6.5.87

Dear Mr Moohouse,

The Red Rocks National Wildlife Refuge is one of Montana's treasures and truly a claim to fame due to the trumpeter swan and the peregrine falcon.

The Centennial Mountains Wilderness Study Area is an integral part of the Red Rocks National Wildlife Refuge because the Centennials are the watershed for the Red Rocks.

Please support a more comprehensive ecosystem alternative to the BLM and FS draft EIS that includes only 26,248 acres of wilderness.

Please include more of the 92,000 acre Centinaral Mountain Wilderness on both sides of the Continental Divide. Thank you.

L.M. Minich

145A

JUNE 14, 1987

To whom it may concern;

I would like to see as much wilderness as physically possible in the Centennial Mountains. According to my calculations, that would be about 89,385 ACRES, which includes BLM ground (26,371), BeaverHEAD NAT'L FOREST (4,474 ACRES), TARGHEE (42,040), and the Sheep Experiment Station (16,500 ACRES). I still remember my first drive over Red Rock PASS several years ago when I first moved to DILLON. I couldn't believe how beautiful they looked. I consider the Centennial AREA MY favorite area on the BeaverHEAD!

I don't think it is RIGHT TO MAKE SUCH A SMALL ISLAND OF WILDERNESS as YOU HAVE PROPOSED. It's not enough to sustain itself. I also don't see how the Sheep Exp. Station can refuse to cooperete in

O-10 the process! Being relatively close to Yellowstone NAT'L PARK also makes it very important to include as wilderness as it is part of the GREATER Yellowstone Ecosystem. The fact that grizzly BEARS AND PEREGRINE FALCONS

F-2 MAY USE THE AREA IS VERY IMPORTANT AND GRATIFYING TO

145B

me.

All through the DRAFT STUDY/EIS mention IS MADE that the soils are unstable and highly ERODIBLE, thus making severe siltation a very likely consequence if it is logged. I'm also concerned with

M-32 economic consequences, as YOU ARE! I'd like to Know what it costs the taxpayer, when an area is logged, whether it be in the Centennials OR ANYWHERE else FOR that MATTER. I'd hate to think that I'm SUBSIDIZING THE TIMBER INDUSTRY!

I plan on visiting the Centennials a lot this SUMMER and hope it is as nice looking up close ~~and~~ as it looks from the valley. I don't want to get in there and see a bunch OF ROADS AND CLEARCUTS. MAKE IT WILDERNESS. All OF IT!!!

Thank you FOR your attention,

Fred Misbuechle

JUN 1 9 87

146A

20 May 1987
Monida Star Route
Lima, MT 59739

Mr. James Moorhouse
Butte District Manager
Bureau of Land Management
Box 3388
Butte, MT 59702-3388

Sir;

I am writing in regard to the Centennial Mountains Wilderness Draft Environmental Impact Statement.

It is my opinion, as a resident of the Centennial Valley, that certain important aspects of the plan need to be addressed, and hopefully rectified, in the final EIS.

First, I would urge you to make every effort to include the USDA Sheep Experiment Station lands in the EIS. These lands are due south of Red Rock Lakes NWR, and consequently their management, or lack of same, directly effects the refuge. I understand that considerable siltation of refuge waters already occurs due to erosion on these lands. This is having an adverse impact on refuge ponds and lakes, and consequently on the waterfowl they support. It is critically important for the refuge, as well as other down-stream water users, that these lands and their management be addressed.

I-1 Second, certain land use practices, such as timbering, will exacerbate the problems of water quality mentioned above. The quality of the timber in most of the Centennials is quite poor, and undoubtedly a marginal economic asset at best.

M-3 Considering the adverse impacts on water quality, soil erosion, and wildlife (e.g. increased roading and resultant poaching; loss of critical thermal and escape cover for elk, moose, deer and bear; and loss of nesting habitat for forest birds (including such sensative species as Great Gray Owls and Goshawks); and loss of productivity in refuge waters, with concommitant impacts on Trumpeter Swans and other waterfowl), the forest is undoubtedly more important in its present state. In addition to these considerations, reflect on the aesthetic impacts of clearcutting, and the fact that regeneration of timber in this area is very slow (probably in excess of the 85 year rotation postulated in the Draft).

Third, I would like to urge that you consider a more comprehensive plan that would include lands on both sides of the divide. Leaving aside the considerable beneficial impacts of wilderness on the wildlife, soils and waters of the area (at a time when healthy aggregations of these wildland components are increasingly rare and economically more important than ever), consider the economic impacts of the increased tourism and attention that these lands will generate if protected as wilderness. A larger

146B

wilderness area will not only stay healthy longer, but attract more hunters, hikers, and other wildland users.

In conclusion, I would like to thank you and your staff for the work that you have already put into the Draft EIS, and for the opportunity to comment on it. I sincerely hope that you will consider these comments carefully.

Sincerely,

Carl D. Mitchell
Carl D. Mitchell

147A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15

I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as far as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

Livestock need to be able to graze the area also. Men do not know how to balance the natural order of things, and it is not done so especially through wildnerness. The Bird refuge has not been enhanced by wilderness. It is a known fact that the birds will not feed and nest on the long, soured, un-grazed grasses allotted to them from wilderness. They go to where the cattle have grazed and enjoy greater benefits there. Grazing and proper management on it will make it more productive than it already is.

I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

Glenna Morrison
5655 Hwy. 91 N.
Dillon, Mont.
59725

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15

I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as far as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

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I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

Kermit Morrison
5655 Hwy 91 N
Dillon Mont 59725

148A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15

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I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

Arlene G. Moss
1100 Driveway Lane
Dillon, Mt. 59725

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

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I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

Don B. Moss
1100 Driveway Lane
Dillon, Montana 59725

JUN 19 87

149A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

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Thank You

[illegible]
1775 Schuler Lane
Dillon Mt.
59725

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

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I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

1775 Schuler Lane
Dillon Mt 59725

150A

P.O. Box 973
Lewiston, ID 83501
June 19, 1987

James Moorhouse, District Manager
Butte District -- BLM
Box 3388
Butte, MT 59702-3388

Dear Mr. Moorhouse:

I would like to comment on the Draft Environmental Impact Statement for the Centennial Mountains Wilderness Study Area. This document contains serious flaws and needs revision.

F-3 1. The document does not assess impacts of this decisionmaking process on grizzlies in the context of the Centennial WSA as part of the greater Yellowstone Ecosystem. As you are aware, assessing the cumulative impact of this decision along with other synergistic actions occurring in the region is required by NEPA. In addition, since the grizzly is designated as a threatened species in this area, the Bureau of Land Management has responsibilities under the Endangered Species Act to protect the bear from adverse impact.

2. The DEIS does not adequately analyze the impact of logging and other developments on water quality. The area provides watershed, feeding water to Red Rocks National Wildlife Refuge. It is steep and vulnerable to erosion that would seriously harm water quality in the refuge. Yet the DEIS fails even to analyze the impacts of nearby logging on trumpeter swan wintering habitat in Lima Reservoir.

O-16 3. The DEIS does not consider the impacts of wilderness designation in the Sheep Experiment Station. Although these lands are managed by the Agricultural Research Service and BLM has no O-17 direct authority over these lands, Congress should be informed of the environmental impacts of wilderness designation for these lands. Merely because your agency does not have legal authority to carry out this action is no excuse under NEPA for failing even to consider the impacts of this alternative.

In general the DEIS requires increased scrutiny of the impacts development would cause to wildlife and scenic values. After full examination of these impacts, BLM should recognize the greater protection of water quality through wilderness designated is necessary, given the important wildlife resources impacted.

Sincerely yours,

Heather Noble

Heather Noble

151A

6/15/87

NW 2010 Turner Dr.
Pullman, WA 99163

Mr. James Moorhouse, District Meneger
Butte District-BLM
Box 3388
Butte, MT 59702-3388

Dear Mr. Moorhouse:

I would like to comment of the Dreft EIS (DEIS) for the Centenniel Mounteins Wilderness Study Area. I think the BLM should support a more comprehensive ecosystem alternative of e 92,000 ecre Centenniel Wildernesson both sides of the Continentel Divide. I think that there ere pristine ereas of high quality wilderness lends on both sides of the divide which deserve inclusion in the Centenniel Wilderness Aree. I elso urge to revise the DEIS to include enalysis on the impacts of development on wildlife, recreetion end scenic velues. I believe we need to ensure protection of these increasingly scerce resources. Finelly, I would like to see more stringent protection of the weter quality in the Centenniels because it is of paramount importence to the survivel of ertic greyling, trout and the trumpter swens.

Sincerely yours,

Thomas L. Noland

Thomas L. Nolend, Ph. D.

152A

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

M-15

I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as fa as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

Livestock need to be able to graze the area also. Men do not know how t balance the natural order of things, and it is not done so especially through wildnerness. The Bird refuge has not been enhanced by wilderness. It is a known fact that the birds will not feed and nest on the long, soured, un-graz grasses allotted to them from wilderness. They go to where the cattle have grazed and enjoy greater benefits there. Grazing and proper management on it will make it more productive than it already is.

I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

William Park 419 E Cornell St Dillon
Meg Park 419 E Cornell St Dillon

JUN 22 87

153A

June 1, 1987

James Moorhouse
District Manager
Butte District BLM
Box 3388
Butte, MT 59702

Dear Mr. Moorhouse:

I-1

We am writing in support of Alternative Two (2) of the Centennial Mountains Draft Environmental Impact Statement. Both of us are trained zoologists, and we both feel that the Centennial Mountains are too important in the ecology of the Greater Yellowstone ecosystem to allow timber harvesting in the area. We are especially concerned with the fate of the Red Rocks National Wildlife Refuge if the nearby land is not protected. It has been touch and go for the beautiful and unique trumper swan for the last few years, with unexplained population losses. We need to do everything we can to help these birds survive the intrusions of mankind and to protect the vital Greater Yellowstone ecosystem.

Sincerely Yours,

Dorothy H. Patent
Dorothy H. Patent

Gregory J. Patent
Gregory J. Patent

154A

Rt. 1, Box 521
Victor, ID 83455

June 1, 1987

District Manager
Bureau of Land Management
Box 3388
Butte, MT 59702

Dear Sir:

I am a farmer, who lives outside Victor, Idaho within sight of the Targhee National Forest.

With regard to your draft EIS on the Centennial Mountains in Montana and Idaho, it appears to me that wilderness status ought to be proposed for a far greater area than just the Red Rocks' watershed. I've observed Targhee Forest management of public lands around Victor, and I think that any area with the qualities of the Centennials needs greater protection than mere "multiple use" forest management. I would urge you to increase the acreage recommended for wilderness status.

Sincerely yours,

Charlie Peterson
Charles E. Peterson

155A

Phil Gezon
Project Manager
Butte District Office of B.L.M.
Butte, Montana

March 11, 1987

Dear Sir!

In regard to the "Centennial Mountains Wilderness Study Area" (Centennial Mts. Wilderness Draft Environmental Impact Statement), I am giving my comments.

I firmly support Alternative two - which includes the entire area as official Wilderness.

I surely support the recommendations of the Wilderness Society, Sierra Club, Etc. in their recommendations for this "Wilderness Study Area" & all Wilderness Study Areas, etc. in the United States, etc.

Sincerely,

William P. Peterson
117 [illegible] Ave. N.
Hutchinson, Minnesota
55350

156A

James Morehouse
District Manager
Butte BLM District
Box 3388
Butte, Montana 59702

May 10, 1987

Dear Mr. Morehouse:

One of the most spectacular areas outside Yellowstone National Park has to be the Centennial Mountains. It is incredibly scenic, immeasurably important for wildlife and shockingly unprotected! The recent decision by BLM to recommend only 26,248 acres of the 92,000 acre roadless area as wilderness is unbelievably shortsighted. The entire range should be protected for its natural values, realized and as yet undiscovered. It is a range of outstanding, qualifying values. There is no range more suited for wilderness that is currently unprotected. Proceed on this vital recommendation.

F-2 The known value of the range includes its habitat for the vanishing grizzly. I was fortunate this very weekend to have seen a sow and two cubs in the Park. For fifteen years, I have come to Yellowstone every spring, summer and fall to catch sight of the great bears. I have hiked in all the forests around the Park, in places where bears have been sighted and in places recognized as proper habitat. On May 9, I had the great fortune to watch that little family tumble across a sage slope and disappear into the forest edge of Hayden Valley. It was something I will never forget.

But more than my own pleasure and thrill, the value of that sighting was the knowledge that the bears do exist and perhaps with proper planning can thrive -- IF GIVEN THE PROPER SIZE, QUALITY AND UNFETTERED USE OF SOLID HABITAT. The Centennials offer those values for the great grizzly. The entire Greater Yellowstone Ecosystem is hosting a sadly dwindling number of the bears. The spectacular Centennials, harboring grizzly bears, must not be added to the list of former ranges for that great American creature.

O-16 Releasing over 60,000 acres of this vast, critical range to development is not a good land manager's best decision. The DEIS could easily be revised to include those lands unanalyzed for wilderness suitability by the Agricultural Research Service on the Sheep Experiment Station. These lands comprise another critical segment of the range.

I-1
I-4 The Centennials' value as a watershed critical to the survival of a relict population of arctic grayling and temporal trumpeter swan population is well known. The endangered peregrine falcon nests in the Centennials, a rare Montana home for this recovering raptor species. The golden eagle, lynx, wolverine and the great grey owl are all found

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on this pallast between Idaho and Montana and must receive the protection they are guaranteed as Montana Species of Special Concern.

It is most appropriate that BLM and the Forest Service reassess the wilderness potential of the entire Centennial Range. To omit them at this critical time is unfathomable. (Why "critical time?" The range is pressured, like other ranges in the West, for its timber wealth. But their are other more lasting values to be garnered from such a wild, precious place.) The protection of the wild, special species dependent on this wild range, the maintenance of a high quality watershed and the resistance to local pressures to develop a gem of the Yellowstone Ecosystem must be the guiding reins of BLM and Forest Service planners.

As a public school teacher, I hope to see the children I teach inherit some of the glory of this nation-- as it once was. Our textbooks are already overflowing with pictures of relics. The grizzly and the throbbing life dependent on the wild Centennials must not be logged on the pages of thoughtlessness.

I urge your protection of 92,000 acres of the Centennials through a careful recommendation of wilderness for the range.

Please inform me of the progress of this issue. Place these comments in the official public record for the wilderness decision on the Centennials.

Most sincerely,

Margaret Pettis

Margaret Pettis
190 South [illegible] West
Hyrum, Utah 84319

157A

Scott Ploger
760 K St, Apt. 2
Idaho Falls, ID 83402

James Moorhouse
Butte BLM

June 16, 1987

Dear Sir:

Thank you for the opportunity to comment on your draft wilderness EIS for the Centennial Mountains. I found the document well-prepared, with the glaring exception that the decision logic behind selecting Alt 1 as preferred was not stated clearly anywhere. As such, the decision seems flimsy and arbitrary.

I definite support a larger wilderness recommendation for permanent preservation of wildlife habitat. Your assumptions on land use management are valid only over the first planning cycle. Of the alternatives presented Alt. 6 seems most reasonable. In particular, Alt. 6 does justice to the Idaho side, where pressures to log Doug fir on the Targhee by the Rexburg L-P mill will continue to mount, eventually risking the elk and moose herds. Too much damage already.

Your scenic descriptions of the Idaho side are generally fair, but upper Ching and Cottonwood Creeks are truly spectacular and worthy of decent protection. So is most of the Sheep Station, politics not withstanding. Scott Ploger

O-16

158A

May 26, 1987

Dear Mr. Moorhouse,

I am writing to urge action by the BLM for a more comprehensive ecosystem alternative for a 92,000 acre Centennial mountains Wilderness that would include both sides of the Continental Divide.

I-1
I-2 I also hope that you will do alot more to protect the water quality in that wilderness area to prevent serious detraction to the survival of Grayling, trout, trumpeter swans & other wildlife

Please, please revise the DEIS to evaluate ~~what~~ the damage that development does to wildlife, scenic values & recreation so that they will be protected forever.

Please include in that DEIS revisement an analysis of wilderness suitability of lands owned by the Agric. Research Service on the Sheep Experimental Station.

Please know that our precious resources are cared about & that we, the public, trust & count on you to preserve them from the encroachment of those interested in material gain of any sort. Sincerely, Sallie, Pey

MAY 28

159A

16 June 1987

Mr. James Moorhouse
District manager
Butte District - BLM
Box 3388
Butte, MT 59702-3388

Dear Sir:

In reference to the Centennial Mountain wilderness plans, I recommend strongly that more wilderness than recommneded by the BLM and Forest Service be allocated on both sides of the mountains. The water quality of the region is also very important to maintain especially in the productive marshes of Red Rocks Lakes. We have the trumpeter swan located at Turnbull Wildlife Refuge in eastern Washington and I would be very disturbed if these birds were affected by development in the Centennial watershed. Also the long term benefit-cost ratio would seem to be enhanced by the protection of lands supporting high scenic, recreational, and wildlife values as opposed to their development. M-15

Sincerely,

Fred W Rabe

Fred W. Rabe
229 East "C" Street
Moscow, Idaho 83843

Please make this letter part of the hearing record

FWR/sp

160A

Mr. Phil Gezon
Bureau of Land Management
P. O. Box 3388
Butte, Montana 59702

June 17, 1987

Dear Mr. Gezon:

Please add these comments to the record on your Centennial Mountains hearings.

I am familiar with the undeveloped Centennials. Steep-sloped and high, with a short growing season, they are not a good timber-producing area. No merchantable minerals are present in the study area.

However, wildlife is abundant, and wilderness recreation continues to increase in the area.

In short, the undeveloped Centennials are closely connected to the Red Rock Lakes Wildlife Refuge and should be managed as wilderness. In fact, you and the Forest Service should revise your proposal and recommend about 92,000 acres of the scenic Centennials as wilderness.

Thank you.

Sincerely,

Roy Rasmussen
1805 Wilder
Helena, MT 59601

SENT 4-1

4/15/87

Send The Very Best . . . Grizzly Bear Prints

I would like to request a copy of the draft Centennial Mts Wilderness Study/EIS, as the Red Rocks/Centennial area is very close to my heart. I lived in W. Yellowstone area for 10 yrs.

I understand you've proposed 26,900 acres as wilderness (MT) out of about 97,000 acres. This is certainly commendable. This area is superbly beautiful & of course. This area so. of Red Rocks needs protection also because development here "would finish off the refuge" (Barry Reiswig) because of siltation, primarily. As you know, the cygnet population of trumpeters has been falling in recent years. We must protect this valuable wildlife habitat! Thank you for your concern. Sincerely, Gail Miller-Richardson

ROCKY MOUNTAIN GOAT

related to antelopes

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161A

Gail Miller Richardson
1018A Palmer
Missoula MT 59802

chtown, MT 59834

162A

Diplomate American Board of Dermatology
American Board of Internal Medicine

P. BRIAN ROGERS, M.D., P.S.
1727 WEST COLLEGE
BOZEMAN, MONTANA 59715

Telephone 406-587-4432

April 28, 1987

District Manager
Butte District Office of BLM
P.O. Box 3388
Butte, MT 59701

Dear Sir:

I am writing to voice my support for the proposal to create a 72,000 acre Centennial Mountain Wilderness Area. I understand that this proposal is being made under the National Preservation System and that public input is being solicited.

I-2 The current management of the Centennial Mountains is presently a confusing mixture of state land, private land, Agricultural Research Service land, and National Forest Service land. In its present divided form the Centennial Mountains are extremely vulnerable to logging, road construction, and even private development. I am not an elk hunter but I am concerned about the loss of big game habitat if development is allowed in the Centennial Mountains. Furthermore, erosion and silt deposition from road building will have an adverse effect on both cutthroat and grayling populations in these Centennial streams as well as in adjacent Redrock Lakes National Wildlife Refuge.

I think each "wilderness" proposal needs to be examined carefully on a case by case basis. In the past, some acreage has been placed into wilderness in appropriately. With specific regards to the Centennial Mountains, however, there could be no better choice for this designation than this beautiful section of mountains stretching across the Continental Divide.

Sincerely,

P. Brian Rogers, M.D.
PBR/sw

163A

1100 Missoula Avenue
Helena, MT 59601
June 5, 1987

Phil Gezon, Project Manager
Butte District Office of the BLM
P. O. Box 3388
Butte, Montana 59702

Dear Mr. Gezon,

Please include this letter in the record for the Centennial Mountains Wilderness Study.

We support Alternative 2--72,885 acres plus Sheep Station area of 16,650+ lands exchanged for the state, or about 92,000 acres.

We have been on the Red Rocks area and believe the 92,000 acres for wilderness will be the best use for three reasons: protection of wildlife including Trumpeter Swan, Sandhill Crane, Whooping Crane and the Peregrine Falcon, all rare or endangered; for recreation; and for protection of watershed.

M-4 The logging you mention proposed on 13,200 acres is strictly a subsidy operation. The growth (about 30 cu. ft./acre/year) is the lowest category for commercial timber (20 - 50 CF).

Studies by the National Wilderness Association, Natural Resource Defense Council, and the General Accounting Office (GAO) provide conclusive evidence that the Beaverhead and Targhee Forests must spend $100 to recover $6 to $50/Mbf on timber sales. These forests are adjacent to BLM lands; the likelihood is BLM timber is worth less. The figure on P. 61 of the Centennial Mountains Wilderness Study shows BLM will obtain $520,344 annually on a sale of 2.6 MMbf or about $200/Mbf.

This must be a mistake. West Coast timber sells for $200 - $300 Mbf. The GAO shows that Region 4 of the Forest Service recovered an average of $17.90/Mbf for 1981 and 1982. This price also includes credits for road construction and KV (timber stand improvement). So the actual return to the Treasury is the minimum of $5.00 to $6.00/Mbf. For comparison the expense on eastside forests in Region 1 approaches $100/Mbf. Consequently I would estimate BLM timber would lose about $80 - $95/Mbf.

Therefore, logging can hardly be justified in an out-of-way area far from sawmills. The greater problem is the removal of escape cover for wildlife and permanent obliteration of Wilderness. Of even greater concern is the additional sediment which will exit the logging areas and road networks to load up Red Rock Lakes--already in trouble from natural sediment loads.

Our last concern is that on the Montana side of the study Wilderness is proposed as a logical decision, but under similar conditions on the Idaho side it is rejected. Nor is there a good reason why discussion of the Sheep Station lands for Wilderness is left out. From a legal standpoint, we believe it must be done anyway. O-16

Sincerely,

Noel & Irene Rosetta

Noel and Irene Rosetta

cc: Senator Max Baucus
Senator John Melcher
Representative Pat Williams

164A

[illegible]
Centennial Mountain [illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]

165A

Dear Sir

After Reading the Centennials article in
Montana Magazine I am impressed to write
to you and give my view regarding what to
do about the area. I have been through Montana
times and love it alot and someday like to live
there. I have been through the Red Rock lake area
and would like to see it remain unspoiled
and remain as a wilderness and wildlife Refuge.
Montana is one of the few remaining states with
any major Wilderness areas and I know lots
of people who go there to enjoy it. Please leave
it alone.

also I would like to obtain a Interagency
travel Map of Southwest Montana and other
information of the surrounding areas. Thank You,

Sincerely,

Mark T. Rybeck

BARBARA RYBECK
2748 PLEASANT ST.
EUREKA, CA. 95501

166A

725 So. Pacific
Dillon, Mt. 59725
June 7, 1987

James Moorhouse, District Manager
Butte District -BLM
P.O. Box 3388
Butte, Mt. 59702

Dear Mr. Moorhouse:

Please include the following comments in the Centennial Mountains comment record.

I strongly encourage the BLM and the U.S. Forest Service to increase the amount of protected wilderness in the Centennial Mountains Wilderness. The draft EIS proposal calling for only 26,248 acres of wilderness is insufficient and would subject the area to logging, mining and road building which could lead to a degraded Red Rock Lakes ecosystem. The Red Rock Lakes National Wildlife Refuge is dependent upon the Centennial Mountains as a watershed - a watershed necessary to maintaining a quality habitat for wildlife and waterfowl.

J-4 The Red Rock Lakes NWR is a resource which needs protecting because its ability to sustain abundant wildlife and waterfowl contributes to its popularity as a hunting and outdoor recreation paradise. In addition it plays a key role in the survival of the trumpeter swan, serving as a prime wintering area for the once-threatened species which has seen a come-back because of the Red Rock Lakes NWR. Continuation of the refuge's vital role as preserver of the trumpeter swan, as well as other waterfowl and wildlife indigenous to the area, depends upon its ability to maintain quality watershed for the refuge. The fact that the soils underlying the Centennial Mountains are highly erosive and siltation is already a problem on the refuge needs to be realistically evaluated before allowing development such as logging, mining, and road building.

I recommend inter-agency co-operation in developing a comprehensive ecosystem alternative for the study area which takes into consideration the long-term effects of development, including subsequent impact on the Red Rock Lakes NWR and its use as a hunting and outdoor recreation area.

O-16 I encourage the adoption of a proposal calling for a 92,000 acre Centennial Wilderness Area. This proposal would include the experimental sheep station which would be allowed to continue as it has in the past and it would also provide maximum protection for Red Rock Lakes NWR, plus the maintenance of an ecosystem bordering on the Greater Yellowstone Ecosystem. All constitute a resource deserving of protection.

Thank you for including my comments in the record.

Sincerely,

Claudia Schaeffer

167A

1630 Brentwood
Idaho Falls, ID 83402
8 June 1987

James Moorhouse, District Manager
Butte District - BLM
Box 3388
Butte, MT 59702-3388

Dear Mr. Moorhouse:

I am writing in reference to the Centennial Mountains Wilderness study area. I have a special interest in this area, since I own a ranch in the Centennial Valley and my family has been associated with this part of the country for more than 60 years. I believe the Centennial Mountains deserve the maximum possible protection for the following reasons:

G-1 1. Wildlife values. This area forms an important part of the wildlife base for the greater Yellowstone ecosystem. The grizzly bear population in this area is part of the endangered Yellowstone population and should be of special concern. Also important are the elk, deer, moose, wolverine, Canada lynx, bald eagles, and sandhill cranes in the area.

I-1 2. Proximity to the Redrock Trumpeter Swan Refuge. The Centennial Mountains form part of the watershed for the Redrock Lakes where considerable time and money has been expended to protect the swans and it would seem to make good sense to give these mountains wilderness protection where we have already put so much effort into the area.

3. The fragile nature of the watershed. My ranch is located on Bean creek. Some years back, when the Bean creek watershed was logged, the creek flow was severely damaged for several years. I believe that any further logging or development in the Centennial Mountains would do permanant damage to the streams and the fish populations.

O-16 Because I believe this area offers values which must be preserved, I ask that you select Alternative 2 and that you include the land used by the Sheep Experiment Station in wilderness classification.

Sincerely,

Gerald H. Scheid

168A

MICHAEL G. SCHMIDT
1301 Duck Creek Road, Gaylord, Michigan 49735

June 16, 1987

Bureau of Land Management
P.O. Box 3388
Butte, Montana 59702

Dear Sir:

Although I am not a resident of Idaho or Montana, I am a citizen of the U.S.A. and I wish to make my views known concerning the future of the Centennial Mountains. I will be returning again this July to vacation in the Centennials and Red Rock Lakes Area. This wild and scenic stretch of the great divide is a natural treasure and should not be degraded by logging and road-building. I feel the highest priority for use of these lands should be given to their value as wilderness.

M-15 The Centennials provide essential habitat for a vast array of wildlife. Many dollars are brought into local economies by sportsmen and visitors such as myself who are seeking an undeveloped and natural area of beauty.

It is my sincere hope that the management plan now being formulated will preserve the wild and scenic Centennials for present and future generations of Americans.

Sincerely,

Michael G. Schmidt
MICHAEL G. SCHMIDT

MGS/ss

169A

Dick Sorensen
General Delivery
Ponds Lodge
Island Park, Idaho

District Manager
Butte District Office
Bureau of Land Management
P. O. Box 3388
Butte, Montana 59702

Dear District Manager:

I have reviewed the proposed Centennial Mountains Wilderness Study/Environmental Impact Statement and would like to go on record as accepting Alternative #1 of the Statement with the variance for snowmobiles; however, Alternative #3 would be preferred.

Thank you for this opportunity for input into the final version of the impact statement pertaining to the Centennial area.

Sincerely,

Dick Sorensen

DS/mas

170A

Daniel Southard
4685 West Pt. Loma Blvd
San Diego, CA
92123-2225

Phil Gezon, Project Manager
Butte District Office
P.O. Box 3388
Butte, Montana 59702

Dear Sir,

I am taking this opportunity to express my opinion that the reccomended wilderness on the Centenial Mountains be expanded. It needs more acreage in order to be viable as a recreational and wildlife area.

The proposed action reccomends a strip 1-2 miles miles wide north of the Continental Divide, which protects the Red Rock Lakes watershed admirably, but disappointingly neglects primitive recreation and solitude opportunities. The small protected area will provide limited exploring opportunities a possible thin corridor for the Continental Divide National Scenic Trail. By expanding the area into Idaho, opportunities for extended trips into the area, away from roads and clear-cut timber areas.

O-16 I also urge you to reobtain the large inholdings of the Agriculture Research Service

170B

O-16 because the demonstrated poor enforcement of this agency in barring ORV's and maintaining primitive values makes this area incompatible for inclusion in the core of a Wilderness area. Also, by expanding the reccomended wilderness into this area, both protection of the Red Rock Lakes NWR watershed and primitive recreational values will be enhanced.

I thank you for this opportunity to express my opinion of expansion of this scenic area.

Sincerely,
Daniel Southard

171A

Phone Conversation 6-19-87

Kate Stafford
1520 Scenic Drive
Felton, CA 95018

I am a frequent visitor to the state of Montana. I am a nature photographer and writer with a background in Environmental Studies.

I support Alternative 2, the All Wilderness Alternative. We need wilderness rather than multiple use. It is time to put more concern on the plants and the animals than on human needs.

Recorded by Carole Mackin

172A

M-15

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as fa as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

Livestock need to be able to graze the area also. Men do not know how t balance the natural order of things, and it is not done so especially through wildnerness. The Bird refuge has not been enhanced by wilderness. It is a known fact that the birds will not feed and nest on the long, soured, un-graz grasses allotted to them from wilderness. They go to where the cattle have grazed and enjoy greater benefits there. Grazing and proper management on it will make it more productive than it already is.

I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

Delores E. Stoddard
4500 Laknar Ln.
Dillon, Mt.
59725

June 17,1987

B.L.M.
P.O. BOX 3388
1069 Parkmont. St.
Butte Mont. 59702

I'm against the Wilderness proposed for the Centennial Mountains. The area is already wilderness and locking it up would create a hardship on the towns of Lima, Dillon, and all small communities and surrounding areas, as fa as the economy is concerned. People are more important than wilderness; Mining, timbering, and oil exploration add to the economy and create jobs, larger tax base, and make the country strong and prosperous. Wilderness acts just in the opposite. It draws from the tax base, makes land useless and unproductive, and completely wasted for the counties that surround it.

Livestock need to be able to graze the area also. Men do not know how t balance the natural order of things, and it is not done so especially through wildnerness. The Bird refuge has not been enhanced by wilderness. It is a known fact that the birds will not feed and nest on the long, soured, un-graz grasses allotted to them from wilderness. They go to where the cattle have grazed and enjoy greater benefits there. Grazing and proper management on it will make it more productive than it already is.

I'm for the FREE ENTERPRISE system and wilderness does not support that concept in any way. Please see that my vote is considered against the Centenial Mountain wilderness waste.

Thank You

Spence Stoddard
4500 Laknar Lane
Dillon, Mont
59725

173A

JOHN R. SWANSON
P. O. Box 6554
Minneapolis, Minn. 55406

June 8, 1987

Bureau of Land Management
P.O. Box 3388
Butte, Montana 59702

Dear Sirs,

Please accept my **comments** concerning
Centennial Mountains Wilderness Study Environmental Impact Statement

I am acquainted with this area and consider this Centennial Mountains area as a unique, varied and essentially fragile area that contains outstanding wilderness, as well as, scenic, wild life - biological and cultural resources of certain National significance.
An area that fully benefits Man, and all life, on this endangered planet.

The only rational management program for this Centennial Mountains area is to dedicate this area as a Wilderness, as it features superb wilderness attributes, and must be included in our National Wilderness Preservation System at this time.

I, then, urge that a realistic wilderness be fashioned for this area
as the
Centennial Mountains Wilderness to include **138,000 acres**
so that this outstanding area may be saved to fully serve our Nation.

For when we save Wilderness;
we save America!

Sincerely,

John R. Swanson

JUN 12 87

BUREAU OF LAND [illegible]

174A

May 14, 87

B.L.M.

I've been there - I've seen by air & legs, the Centennials - I just want to say - turn these 86,000 acres into designated wilderness.

They are so isolated and out of the way (even Rand McNally Atlases don't show them - the Gravellys but not the Centennials) with only the Lakeview road near them, that economic development shouldn't even be a factor in the discussion.

Finally, please send me a copy of the draft (Centennial Mountains Wilderness Study) Environmental Impact Statement. Thank you.

Sincerely,

An Old Montanan
Trapped back in Portland

Roy Thierry
5306 Fieger
Sterling Hts. Mi.
48310

RECEIVED

MAY 21 87

175A

736 Alderson Ave.
Billings, MT 59101
June 12, 1987

District Manager
Butte District Office of the BLM
P.O. Box 3388
Butte, Montana 59702

Subject: Comments on Centennial Mountains Wilderness Study
Draft Environmental Impact Statement

Dear Sir/Ma'am:

I am writing to comment on the February 1987 Draft Environmental Impact Statement for the Centennial Mountains Wilderness Study.

F-4 My first comment is in regard to the discussion of endangered species thoughout the document. I did not see any mention of whooping cranes. In recent years, whooping cranes have utilized the Centennial Valley during the summer months. The area may be beneficial in establishing a viable population in the western United States. While the study area probably does not contain any crane habitat, the management of the study area affects the watershed of the habitat. Whooping Cranes should be included in the EIS.

M-14 I also have some comments concerning the economic impacts. It appears that the draft EIS only uses jobs created as a measure of economic impacts. There are other economic impacts that could be included. For example, in alternatives 1, 3, 4, 7, and 8 under the discussions on unstable soils, mention is made that irrigation storage will be lost in Lima Reservoir due to siltation. There is an economic value to the storage in Lima Reservoir. It is also possible that damage to wildlife habitat on and off Red Rocks Lakes National Wildlife Refuge would lead to projects to re-establish habitat. It generally is very expensive to re-establish habitat and this would be a direct economic cost that could be partially attributed to management of the watershed within the study area. Inclusion of these items would make the economic impacts of alternative 5 similar to alternatives 1 and 3.

O-16 I think the exclusion of the Sheep Station from the study emphasizes the problem discussed in Appendix D. Recommendation R-6.6 of the BLM Management Framework Plan discusses the fact that the Agricultural Research Service does not have the management authority or expertise needed to manage the area's unique values. The exclusion of the Sheep Station highlights the single-minded management of this area that ignores the environmental impacts of management decisions.

In conclusion, I think the final EIS should include considerations of impacts on whooping crane habitat and more fully consider the economic impacts of the alternatives. With these considerations included, the biggest difference between alternatives 1 and 5 would be that alternative 5 protects all of the Centennial Valley watershed within the study area. I feel that the effect this would have on wildlife is justification for making alternative 5 the preferred alternative.

Sincerely,
Jason H Thom
Jason H. Thom

176A

June 4, 1987
56 Blue Sky Heights
Clancy, Mt. 59634

Bureau of Land Management
P.O. Box 3388
Butte, Mt. 59702

Dear Sir:

I would like to submit my vote "for" your recommendation for a 26,248 acre Centennail Mountains Wilderness area. A unique area such as this deserves protection from the destructive effects of commercial development.

Thank-you for your consideration.

Sincerely,
Gordon Thompson
Gordon Thompson

P.S.
Please send your Interagency Travel Plan and Visitors Map of Southwest Montana that covers the Centennial Range and surrounding country.

177A

March 15, 1987

State director of BLM
222 N 32nd St
P O Box 36800
Billings Montana
59107 - 6800

DEPT OF INTERIOR
1987 MAR 18 AM 9 00
MONTANA STATE OFFICE
BILLINGS, MONTANA

Dear Sir

Alternative 2 seems the best to me

F-2 Limited drilling is practical on private lands which would provide jobs

We need this wilderness to protect the environment and wildlife such as grizzly bear, wolves and other large animals require much space

yours truly
Ethel W Thornley
and many friends

MS ETHEL W THORNILEY
18653 SCHOENGERR
DETROIT MICHIGAN 48205
MADD

178A

June 12, 1987
940 Wilder
Helena, MT 59601

District Manager
Butte District Office of the BLM
P.O.Box 3388
Butte, MT 59702

Dear Sir/Madam:

I am writing in response to the DEIS for the Centennial Mountains.

I would urge the following:

O-16 1. that the sheep experiment station, which occupies the heart of the WSA, be included in the study with the understanding that it may be shut down as "the very best primitive resource values in the Centennial Mountains are contained within the Sheep Experiment Station boundaries." (p. 106, DEIS)

F-1 I-1 2. that the preservation of the Red Rocks Lakes NWR be considered of the highest priority. The soils in the Centennials are so unstable that any disturbance would hasten the already existing problem of siltation of the lakes in the refuge. The fact that a significant population of trumpeter swans are totally dependent on the refuge and that the endangered peregrine falcon use the refuge as a prey base (and have successfully nested in the Centennial Mountains) should be reason enough to make the NWR an important consideration.

3. that the total acreage of the WSA plus the 16,650 acre sheep experiment station be designated wilderness because of the high quality of primitive recreation and the importance to threatened and endangered wildlife.

Thank you for such a well done DEIS.

Sincerely,
Sara Toubman
Sara Toubman

179A

610 East Sussex Avenue
Missoula, Montana 59801
April 6, 1987

District Manager
Butte District Office
Bureau of Land Management
P.O. Box 3388
Butte, Montana 59702

Dear Sirs:

Thank you for the opportunity to comment on the Centennial Mountains Wilderness Proposal.

O-16 The 21,774 acre wilderness proposal is certainly a step in the right direction. However, much of the Sheep Station land should have been included in the proposal. Also, management of this area must be coordinated with management of the Greater Yellowstone Ecosystem.

I hope that phosphate mining will never take place within the drainage of the valley. Such a disruption could greatly increase eutrophication rates of Red Rock lakes.

Sincerely,

Marlen Tweten

Marlen Tweten

180A

May 5, 1987
Melrose, Montana

Dear Sir

I was at a meeting in Dillon June 3, and would appriciat a copy of the draft Eis.
It wasn't mentioned at the meeting about building any dams to store water on there free flowing rivers
If people want to fish they better think about storing ~~war~~ water, just like a rancher has to put hay up, for all his cattle.

Yours truly

Matt Lerick

181A

4060 W. 115th St. Apt. 204
Chicago, Illinois 60655
June 7, 1987

James Moorhouse, Manager
Butte District
Bureau of Land Management
P.O. Box 3388
Butte, MT 59702-3388

Dear Mr. Moorhouse:

I am a teacher and librarian. I spend every summer in Montana. My relatives live there. Even my great grandparents are buried near Polson. I want to ask you to support a more comprehensive ecosystem alternative of a 92,000 acre Centennial Mountains Wilderness in Montana and Idaho on both sides of the Continental Divide.

F-3
O-16 The tentative statement is deficient in that it fails to assess relationships between the Centennial Wilderness Study Area and the Greater Yellowstone Ecosystem. The Sheep Experiment Station must be included.

Thank you for your attention.

Sincerely,

Tobi Van Dyck

Mrs. Tobi Van Dyck

JUN 1 1

182A

[illegible]

Dear Sir

[illegible] comment on the area
[illegible] Montana and Idaho on the
Continental [illegible]
[illegible] will [illegible] all [illegible]
[illegible]
and [illegible] will have
nothing [illegible]

Thank you

[illegible]

187A

Concerning the Centennial Proposed Wilderness

I feel that we have enough land in these areas of South western Montana set aside as wilderness, primitive, and road less now. I feel the impact on the areas that are open would be put under more stress if we lock up more area. It would impact the economy of this area more than it is now and it is depressed enough now. I feel that the areas proposed for wilderness could be utilized under multiple use better than wilderness. Mining and timber interest could be managed ~~[illegible]~~ with stricter environmental standard to protect the water shed & quality. I feel that selective logging is much better than clear cutting. The area should be left open for snow-machines in the winter time. Some roads should be closed during hunting

O-16 seasons to control impact. The Sheep Mountain North face and extending to Tom Creek should be kept in its present state. I have lived in the area and made a living here since a small boy. My grand parents were

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187B

pioneers in the Centennial valley. The wild life and quality of the area has improved in the forty years that I can account for. It is a beautiful area but if more is locked into wilderness it will not remain so if the pine beetle and spruce bud worm are allowed to keep destroying the timber. I feel with common sense and good management the quality of the area can be maintained with out wilderness.

Bob Wilson
Box 16
Lima Mt. 59739

188A 6·17·87

Dear Mr Moorhouse,

I am writing to ask that you get the BLM-Forest Service proposal revised and support a more comprehensive ecosystem alternative of a 92,000 acre Centennial Mountains Wilderness in Montana and Idaho on both sides of the Continental Divide

F-3 The tentative environmental statement is deficient, in that it fails to assess the relationship between the Centennial Wilderness Study

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F-3 area and the Greater Yellowstone Ecosystem, even though it acknowledges Centennial grizzly bears are important in the Yellowstone Ecosystem.

Include this letter in the hearing record and environmental statement on the Centennial Mountains Wilderness Study area.

Sincerely

Richard C Wilson

JUN 2 2

RICHARD C. WILSON
2111 NIMITZ DR.
DES PLAINES, IL 60018

188B

189A

George Wuerthner
Box 7192
Missoula, Mt. 59807

April 4, 1987

BLM-- Butte District Office
P.O. Box 3388
Butte, Montana 59702

Dear BLM:

The following are my concerns about your draft Centennial Mountains Wilderness Study/EIS statement.

I do not support your recommendation for a 26,248 acre wilderness for the Centennials. I think your study indicates that the entire 72,885 acres are suitable for wilderness designation and your recommendation to Congress should reflect this. As I understand it, Congress directed the BLM to review its roadless lands and recommend all those that have wilderness qualities. There are no real major conflicts to the all wilderness alternative for this region of sensitive wildlife habitat, unstable soils, and scenic values. Therefore, I support your alternative 2 which calls for the creation of a 72,885 acre wilderness.

Timber in this region is a minor issue. Most of the timber identified as commerical quality is in the western third facing the Centennial Valley, yet the majority of the commerical timber stands in this western third are included in your preferred alternative--hence one can assume that timber is really not an issue here. Plus timber harvest in the Centennials is questionable at best. These stands are located far from any mill and transportation costs would be high. In addition, considering that 50% of the range is grasslands or alpine plus there are extensive slow growing sub alpine timber stands, the amount of sawtimber that would be available for harvest is not significant. There is a further constraint imposed by potential soil erosion problems. As stated in your EIS some 48% of the study area has highly erodible soils.

The BLM and other agencies often use the bogus arguement that wilderness designation will not allow for the control of insect and disease outbreaks in timbered areas, but this arguement can be turned around. First, insect and disease are perfectly natural ecological functions and not abnormal at all. In fact, control is the unnatural and damaging activity since it simply enhances the conditions which make a timber stand susceptable in the first place. For example pine beetle outbreaks in lodgepole can only infect those stands are trees are crowded and thus weakened by excessive competition. The beetle outbreak serves to thin the stand in the absence of fire, thus fire, insects and disease are essential elements of a healthy forest. In essence, protecting a stand from fire,insects, or disease makes for an unhealthy forest and intensifies the crowding--hence the likelyhood of further or future insect or disease outbreaks.

Second, at least within designated wilderness there is no need for control since there is no economic loss once the timber was removed from

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189B

the timber base. There is some validity to the arguement that lack of control in wilderness will allow the epidemic to spread into adjacent non-wilderness areas. But considering the benefical aspect of a major insect epidemic on the forest, it could be argued that this is the best thing that could happen.

Grazing is not really an issue either since livestock grazing is permitted within designated wilderness. Though, as the EIS notes, there might be some inconvenience created by wilderness designation since permittees would have to ride horses like real cowboys instead being able to drive to their allotments. This seems to be a minor issue especially considering these are public lands and livestock grazing is graciously permitted by the public at large and is certainly not a right.

The potential loss of 375 AUM's is minusule and would not even put a dent in present livestock production and only represents a possible increase. Furthermore, with total wilderness designation and no control on such timber thinning agents as wildfire, insect and disease, there is very likely to be an overall increase in the amount of forage available for grazing, that may well more than compensate for the minor loss of 375 AUM's.

M-1 In the chart showing the economic loss or benefit from different management schemes, it shows a potential net gain of 22 job related to timber harvest under a no wilderness alternative. This is somewhat misleading for several reasons. First, it assumes that timber harvest of all available commerical stands would take place, which given the highly erodible soils, the impact on elk herds, and endangered species like grizzly bear, is somewhat questionable at best. Secondly, there is no M-32 place in the EIS which shows how much such timber harvest would eventually cost the taxpayer. Considering that many of the timber sales on the adjacent Targhee and Beaverhead National Forests are below cost, there is a real potential that each of the jobs attributed to timber harvest will cost a great deal more than just giving the money to local loggers not to log. I feel an estimate of the cost of timber sale administration, preparation, road construction, mitigation on soil erosion, fisheries, and wildlife losses should be presented and be available for comparison.

M-2 For example considering that 300-500 elk utilize this area for fall and early winter migration and staging grounds, and many hunters willingly pay hundreds, and at times thousands of dollars to shoot an elk, this represents a yearly worth of this habitat of hundreds of thousands of dollars. Your figures on the value of elk hunting seem grossly underrated, but at best only represent the value of elk in terms of potential employment.

Furthermore it would take twenty to forty years for a stand to grow back into suitable elk security cover. This, in addition to the losses associated with road access as documented in your EIS, how much is the potential loss of elk habitat alone worth, much less the impact on other resources such as fisheries etc.? I would say when all factors are considered including recreation, elk habitat, fisheries, plus the costs of trying to mitigate these impacts if timber harvest were developed

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189C

M-2 cont. versus leaving the area alone, the real costs of timber harvest would be found to be outrageously high when compared to the supposed economic benefits it would create. Is this being represented in your economic charts?

G-1 F-2 Finally, the Centennials are an important potential migration corridor for wildlife along the entire continental divide region. If there is ever to be any hope of grizzly bear population expansion so that it can be taken off the Endangered and Threatened Species list, there must be areas where recolonization can take place. A grizzly was trapped in the Gravelly Range in 1984. How did it get here? Very like coming along the divide from the Lionhead area and into the Mt. Jefferson region and over through Alaska Basin and into the Gravelly. Another grizzly was reported for the Italian Peaks area further to the west. I suspect that none of these bears represent breeding populations, but wandering individuals are the hope for new population nucleus. Without protected habitat with limited access, such bears will end up in traps like the Gravelly range individual. Wilderness designation for the entire range would help to ensure that potential for recovery is still available.

O-7 Finally, I believe your EIS should consider how the Centennials fit into the overall ecosystem concept. Your present plan isolates the range as a mountain uplift giving no consider to its potential for combination with other public lands into a major biological preserve. I urge you to consider how this alternative might fit in with the Americans for Wilderness Coalition proposal for a Gravelly-Snowcrest-Centennial Biological Preserve and Wilderness Recovery Area. This proposal calls for the designation and unified management of the Red Rock Lakes Wildlife Refuge, Centennials and Forest Service lands in the Gravelly and Snowcrest Ranges to be managed primarily for their wildlife and biological values. It would designate all presently roadless country as wilderness and authorize the closure of most existing roads except for major traffic routes.

As a corollary to managing for wildlife and biological values, and given the tremendous damage already done to plant communities, soils, and wildlife values by livestock grazing, this activity would be pharsed out and suspected on these public lands.

In conclusion I feel that alternative 2 the all wilderness proposal best meets all resource and ecological needs, and while the BLM's alternative 1 recommending 26,248 acres is a step in the right direction, it falls short of what the agency should recommend to Congress.

Sincerely:

George Wuerthner

190A

Dear Sirs,

I have worked at Red Rock Lakes Refuge for [illegible] years. I have spent time up the Odell Creek Drainage in the [illegible] time. If you propose to close this corridor to snowmobiles in the winter, I [illegible] [illegible] such an action. [illegible] from Idaho can snowmobile right up the south side of the Centennial Mountains, but us over in the valley will be restricted if a closure is not included in the wilderness proposal to allow snowmobiling in the winter. I would not be for the use of [illegible], motor cycles, or the like. After the end of December, it should be opened to [illegible] of snowmobiles. If it would be possible to exclude the Odell Creek drainage from Wilderness, I believe it would satisfy most concerned parties. Logging in the valley, I believe, should be restricted to no farther east than [illegible] [illegible]. After seeing some of the clear cutting that was done in the past, and how poorly these areas have recovered, [illegible] [illegible] the [illegible] to the [illegible]. The Centennial Valley is a unique [illegible] and a [illegible] [illegible] [illegible], but [illegible] isolate the valley to only the [illegible] [illegible] [illegible] [illegible] country. [illegible] [illegible] for the Wilderness, but leave Odell Creek open to snowmobiling in the winter.

Charlie Young
Charlie Young

191A

POMEROY

POMEROY BROTHERS CONSTRUCTION

July 9, 1987

James Moorhouse
Butte District-BLM
Box 3388
Butte, Montana 59702-3388

Dear Mr. Moorhouse,

I'm writing in support for a 92,000 acre Centennial Mountains Wilderness on both side of the Continental Divide. You already know of the values of the Centennial's but their wilderness value will certainly outweigh in the long run any other value the short term dictates. Especially ORV use and snowmobiles.

I ask you to revise your DEIS to include analysis of wilderness suitability of lands owned by the Agricultural Research Service on the Sheep Experiment Station. This island can not be overlooked.

I'm concerned with water quality and want the most stringent protection possible. Will ORV use degrade the water quality?

Part of the value of the Centennial's is their relationship to the Yellowstone Ecosystem. Of course that is obvious but it must be constantly restated. For instance, last fall my parents were hunting on the Continental Divide on the south end of the Salmon National Forest and they saw a Rocky Mountain Grey Wolf. That animal must roam large expanses of land to survive. Hopefully the wolf will survive, but we must protect with wilderness its habitat.

Remember you have to have a habitat. Thank you.

Sincerely,

Tom Pomeroy

P.O. BOX 1765 · KETCHUM · IDAHO · 83340 208 · 726 · 4366

APPENDIX N
PLANNING FOR RECREATION RESOURCES

Description of Recreation Opportunity Spectrum Classes

The enclosed chart describes each of the six ROS classes in terms of: (1) experience opportunities; (2) setting opportunities, and (3) activity opportunities (see also Glossary of Terms). These descriptors provide a general overview of the opportunities included in each class. These overview statements do not describe each class in detail, but rather provide a point of departure from which the planner or manager can develop more precise prescriptions for each class based on specific situations encountered in field operations. The listing of activity opportunities is provided for illustrative purposes. It is not an all-inclusive list of activity opportunities on the public lands.

THE RECREATION OPPORTUNITY SPECTRUM CLASS DESCRIPTIONS

Opportunity Class	Experience Opportunity	Setting Opportunity	Activity Opportunity
Primitive	Opportunity for isolation from the sights and sounds of man, to feel a part of the natural environment, to have a high degree of challenge and risk, and to use outdoor skills.	Area is characterized by essentially unmodified natural environment of fairly large size. Concentration of users is very low and evidence of other users is minimal. The area is managed to be essentially free from evidence of man-induced restrictions and controls. Only facilities essential for resource protection are used. No facilities for comfort or convenience of the user are provided. Spacing of groups is informal and dispersed to minimize contacts between groups. Motorized use within the area is not permitted.	Camping, hiking, climbing, enjoying scenery or natural features, nature study, photography, spelunking, hunting (big game, small game, upland birds, waterfowl), ski touring and snowshoeing, swimming, diving (skin and scuba), fishing, canoeing, sailing, and river running (nonmotorized craft).
Semi-Primitive Nonmotorized.	Some opportunity for isolation from the sights and sounds of man, but not as important as for primitive opportunities. Opportunity to have high degree of interaction with the natural environment, to have moderate challenge and risk, and to use outdoor skills.	Area is characterized by a predominantly unmodified natural environment of moderate to large size. Concentration of users is low, but there is often evidence of other area users. On-site controls and restrictions may be present, but are subtle. Facilities are provided for the protection of resource values and the safety of users only. Spacing of groups may be formalized to disperse use and limit contacts between groups. Motorized use is not permitted.	Camping, hiking, climbing, enjoying scenery or natural features, nature study, photography, spelunking, hunting (big game, small game, upland birds, waterfowl), ski touring and snowshoeing, swimming, diving (skin and scuba), fishing, canoeing, sailing, and river running (nonmotorized craft).

The Recreation Opportunity Spectrum Class Descriptions—*Continued*

Opportunity Class	Experience Opportunity	Setting Opportunity	Activity Opportunity
Semi-Primitive Motorized.	Some opportunity for isolation from the sights and sounds of man, but not as important as for primitive opportunities. Opportunity to have high degree of interaction with the natural environment, to have moderate challenge and risk, and to use outdoor skills. Explicit opportunity to use motorized equipment while in the area.	Area is characterized by a predominantly unmodified natural environment of moderate to large size. Concentration of users is low, but there is often evidence of other area users. On-site controls and restrictions may be present, but are subtle. Facilities are provided for the protection of resource values and safety of users only. Spacing of groups may be formalized to disperse use and limit contacts between groups. Motorized use is permitted.	Same as the above, plus the following: ORV Use (4-WD, Dune Buggy, Dirt Bike, Snowmobile), Power Boating.
Roaded Natural	About equal opportunities for affiliation with other user groups and for isolation from sights and sounds of man. Opportunity to have a high degree of interaction with the natural environment. Challenge and risk opportunities are not very important except in specific challenging activities. Practice of outdoor skills may be important. Opportunities for both motorized and nonmotorized recreation are present.	Area is characterized by a generally natural environment with moderate evidence of the sights and sounds of man. Resource modification and utilization practices are evident, but harmonize with the natural environment. Concentration of users is low to moderate with facilities sometimes provided for group activity. On-site controls and restrictions offer a sense of security. Rustic facilities are provided for user convenience as well as for safety and resource protection. Conventional motorized use is provided for in construction standards and design of facilities.	All activities listed previously, plus the following: picnicking, rock collecting, wood gathering, auto touring, downhill skiing, snowplay, ice skating, water skiing and other water sports, hang gliding, interpretive use, rustic resorts and organized camps.
Rural	Opportunities to experience affiliation with individuals and groups are prevalent as is the convenience of sites and opportunities These factors are generally more important than the natural setting. Opportunities for wildland challenges, risk taking, and testing of outdoor skills are unimportant, except in those activities involving challenge and risk.	Area is characterized by substantially modified natural environment. Resource modification and utilization practices are obvious. Sights and sounds of man are readily evident, and the concentration of users is often moderate to high. A considerable number of facilities are designed for use by a large number of people. Facilities are often provided for specific activities. Developed sites, roads and trails, are designed for moderate to high use. Moderate densities are provided far away from developed sites. Facilities for intensive motorized use are available.	All activities listed previously, plus the following: competitive games, spectator sports, bicycling, jogging, outdoor concerts, and modern resorts.

THE RECREATION OPPORTUNITY SPECTRUM CLASS DESCRIPTIONS—*Continued*

Opportunity Class	Experience Opportunity	Setting Opportunity	Activity Opportunity
Modern Urban	Opportunities to experience affiliation with individuals and groups are prevalent as is the convenience of sites and opportunities. Experiencing the natural environment, and the use of outdoor skills are largely unimportant.	Area is characterized by a highly modified environment, although the background may have natural elements. Vegetation is often exotic and manicured. Soil may be protected by surfacing. Sights and sounds of man, on-site, predominate. Large numbers of users can be expected. Modern facilities are provided for the use and convenience of large numbers of people. Controls and restrictions are obvious and numerous. Facilities for high intensity motor use and parking are present with forms of mass transit often available.	All activities listed previously.

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APPENDIX O

TIMBER ECONOMICS IN THE CENTENNIAL MOUNTAINS STUDY AREA

INTRODUCTION

During the scoping process for the Centennial Mountains Wilderness Study EIS, the issue of below-cost timber sales was raised. This issue was evaluated by the interdisciplinary team and found not to apply to the Centennial Mountains area. The following report is documentation of that analysis.

SCOPE

According to the land management plans for the three agencies involved (Targhee National Forest, Bureau of Land Management, and Beaverhead National Forest), the only timber that may be harvested in this area in the foreseeable future lies north of the Continental Divide and west of Matsingale Creek in Montana. Since this land is managed by the Bureau of Land Management, the analyses is limited to timber sales offered by this agency.

LOGGING PROBLEMS

Timber harvest in the Centennial Mountains tends to be limited by the distance from the area to local mills, and the number of steep slopes and unstable soils in the area.

The primary access to areas of timber on the Montana side of the Centennials is from the Monida-Lakeview Road. This road provides access from Monida and West Yellowstone, Montana, and Island Park, Idaho. From this road, present access to timbered areas is possible using Price-Peet Road, Bean Creek Road, and Corral Creek Road. This distance between Monida on I-15 and U.S. 20 on the east end of the Centennials is approximately 50 miles.

The most likely mills in Montana to use timber from this area are in Dillon and Belgrade, Montana. The highway distance from Monida to the mill in Dillon is 63 miles on Interstate 15. The capacity of the Dillon mill is approximately 27 mmbf/year, over half of which is harvested from Beaverhead National Forest lands. Total haul distance from the area to the Dillon mill ranges from 80 to 110 miles.

The Belgrade mill has approximately the same capacity as the Dillon mill; the haul distance from the area ranges from 127 to 155 miles.

In Idaho, the Rexburg plant has a capacity of 25 mmbf per year of Douglas fir. Total haul distance ranges from 100 to 120 miles.

Most timber sales offered in the Centennial Mountains have been sold in recent years. Many of the sales had one or two bidders for the timber offered. Primary products produced by local mills are dimension lumber, posts, and poles. Regional demand for wood products is tied to the health of the economy and, more specifically, to the number of new housing starts. Sales of timber from federal lands must at least cover the cost of reforestation at a minimum. In those cases, where multiple bidders are involved, a value greater than the minimum figure can be received.

One of the largest operating cost components of a timber sale is the cost of transporting the logs to the mill. In addition, construction of roads into a harvest site is another large component of the total cost of a sale. The cost of road building is substantial whether built by the federal government or by the timber purchaser. If road construction is required of the timber purchaser, the amount bid for the timber tends to be less than if the roads were already in place. Construction of new roads cost in the neighborhood of $16,000 to $21,000 per mile. Therefore, the cost of road construction, in most cases, is the deciding factor as to whether or not a given timber sale will be sold at a rate below the cost of the sale.

CENTENNIALS TIMBER SALE ANALYSIS

Objective

The objective of this analysis was to develop some cost and revenue information on timber sales that had been proposed or sold in the Centennial Mountains. This section outlines and documents the assumptions that were used in developing this analysis.

Methodology

The method used to develop cost and revenue data is similar to the method used by GAO. The difference in this analysis is that an attempt is made to estimate additional revenue to the federal and state treasuries in addition to the revenue received for the stumpage. These additional items are corporate federal income tax, employee's federal income tax, and employee's state income tax. All costs and revenues are estimated for the year 1985.

REVENUES

Stumpage

Stumpage revenue estimates for sales that are sold are the high bid received for the sale.

Corporate Federal Tax

This is the income tax paid annually by the timber purchaser. The income tax was estimated using the Louisiana Pacific Corporation's 1984 Annual Report to the stockholders. The summary income statements displayed on pages 16-17 of the annual report were used to calculate the average percentage that the expense item "provision for income taxes" represented of the revenue item "net sales" for the years 1975 to 1981, and 1983 to 1984. In 1982, it appears the corporation's annual expense exceeded its annual revenues since "provision for income taxes" was positive. The year 1982 was, therefore, not used to calculate this average. The final average percentage was 3 percent. Estimated federal income taxes were, therefore, assumed to be 3 percent of Selling Value Lumber Tally (L.T.).

Employee's Federal Income Tax

This represents the income tax paid by all employees associated with logging and milling the timber, on their annual income. An average adjusted gross income per year of $17,000 was assumed. From this, $4,000 was deducted to similate exempt income for a family of four. Taxable income was $13,000. The 1984 form 1040 instructions indicate that the tax on taxable income of $13,000 is $1,265. The $1,265 was then multiplied by the IMPLAN total employment of .00849 person years per mbf to generate an employee's federal tax estimate of $10.74 per mbf.

Employee's State Income Tax

The income tax on $13,000 taxable income in Montana is $472. The $472 multiplied by .00849 person years per mbf generates a Montana state income tax estimate of $4.01 per mbf.

COSTS

Road Engineering and Construction

Cost are estimated at $15,000 per mile for construction, and $6,000 per mile for engineering for a total cost per mile of $21,000.

Reforestation Cost

Reforestation costs were pulled directly from the kV plan for the sale.

Sale Preparation Cost

These costs are in terms of dollars/mbf and are composed of the following components shown in Table 0-1.

Sale Administration

These costs were $4.55 per mbf.

TABLE O-1

SALE PREPARATION COSTS EXPRESSED IN DOLLARS PER THOUSAND BOARD FEET

Tasks	Costs
Position Statement	$.15
Sale Area Design	1.50
Plan Implementation	10.00
Appraise and Offer	1.25
Bid Opening	.05
Sale Award	.05
Subtotal	13.00
Office Overhead 30%	3.90
Total	$16.90

EVALUATIONS

The following computation sheets evaluate the timber sales. Table O-2 shows the Price-Peet Salvage Timber Sale and Table O-3 shows Corral Creek Salvage Timber Sale.

TABLE O-2

PRICE-PEET SALVAGE TIMBER SALE COMPUTATION SHEET

Centennials EIS
Bureau of Land Management

Sold 10/04/82

Subject: *Analysis of Price-Peet Salvage Timber Sale Dillon Resource Area (Two Bidders)*

(All revenues and costs per mbf)

Selling Value L.T.[4]	189.49		
Volume	2,725.50	mbf	
Employment Sustained[2]	23.14	person years	
Revenue to State and Federal Treasuries per mbf			
Stumpage			12.44
Corporate Federal Income Tax[5]			5.68
Employee Federal Income Tax[6]			10.74
Employee State Income Tax[7]			4.01
Total Revenue to State and Federal Treasuries			32.87
BLM Budget Costs per mbf			
Road Engineering and Construction			0
Reforestation			5.49
Sale Preparation			16.90
Sale Administration			4.55
Total BLM Budget Cost per mbf			26.94
Excess of Revenue Over Cost per mbf			5.93

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[2] Volume in mbf x .00849 from Centennial IMPLAN Model
[4] Sawtimber
[5] 3 percent of selling value L.T.
[6] $10.74 per mbf
[7] $4.01 per mbf

TABLE O-3

CORRAL CREEK SALVAGE TIMBER SALE COMPUTATION SHEET

Centennials EIS
Bureau of Land Management

Sold 10/04/82

Subject: *Analysis of Corral Creek Salvage Timber Sale Dillon Resource Area*

(All revenues and costs per mbf)

Selling Value L.T.[4]	189.49		
Volume	358.50	mbf	
Employment Sustained[2]	3.04	person years	
Revenue to State and Federal Treasuries per mbf			
Stumpage			8.61
Corporate Federal Income Tax[5]			5.68
Employee Federal Income Tax[6]			10.74
Employee State Income Tax[7]			4.01
Total Revenue to State and Federal Treasuries			29.04
BLM Budget Costs per mbf			
Road Engineering and Construction			0
Reforestation			5.49
Sale Preparation			16.90
Sale Administration			4.55
Total BLM Budget Cost per mbf			26.94
Excess of Revenue Over Cost per mbf			2.10

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[2] Volume in mbf x .00849 from Centennial IMPLAN Model
[4] Sawtimber
[5] 3 percent of selling value L.T.
[6] $10.74 per mbf
[7] $4.01 per mbf

CONCLUSION

The economic viability of timber harvest in the Centennial Mountains is primarily a function of the price of wood products and the cost availability of access. On lands managed by the Bureau of Land Management, there are a number of productive timber sites for which the main access is in place. These areas are the most likely to provide timber harvests which are economically feasible. More importantly the below-cost timber sale question is a national policy matter apart from the question of wilderness in the Centennial Mountains, as discussed in the papers on the following page. Therefore, below-cost sales are not an issue in the Centennial Mountains in the foreseeable future.

GLOSSARY REFERENCES INDEX

GLOSSARY

Including Acronyms and Abbreviations)

ALLOTMENT. An area designated for the use of a prescribed number of sheep or cattle.

AIRSHED. Basic unit in which air quality is managed.

ANTICLINAL. Inclined toward each other, as, the ridge tiles of the roof of a house.

AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACES). Areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.

AUM. Animal Unit Month. A standardized unit of measurement of the amount of forage necessary for the complete subsistence of one animal unit (one cow or one horse or five sheep, all over six months old) for one month; also, a unit of measurement of grazing privilege which represents the privilege of grazing one animal for a period of one month.

BAILEY-KUCHLER SYSTEM. A land classification system which divides the United States into various ecosystems based upon an integration of the natural factors of climate, vegetation, soils, and landform.

BIG GAME. Those species or large mammals normally managed as a sport hunting resource; e.g. elk, deer, bear.

BLM. Bureau of Land Management.

BOARD FOOT. The amount of timber equivalent to a piece of wood one foot by one foot by one inch thick.

BROWSE. Twigs, leaves, and young shoots of trees and and prepares the area for rapid seed germination and gof a new even-aged stand.

CHERRY-STEMMED ROAD. A deadend road prolar, those shrubs truding into a wilderness study area. The road are utilized by big game animals for food.

CLASS II AIRSHED. An area that allows a small to moderate amount of air quality degradation. Area in which increases in contaminant concentration over the baseline concentration shall be limited to those in Table L-1.

CLEARCUTTING. The removal in a single cut of the entire standing crop of trees. It eliminates all shade sources and the area around the road, which is disturbed during construction, are considered outside the study area boundaries.

COMMERCIAL FOREST LAND. Forest land which is producing or capable of producing crops of industrial wood and which has not been reserved or deferred. This includes areas suitable for management to grow crops of industrial wood generally of a site quality capable of producing in excess of 20 cubic feet per acre of annual growth. This includes both accessible and inaccessible areas. Permanently inoperable or nonstocked areas are excluded because they are not suitable for silvicultural management. Conversely, nonstocked areas which are stockable and otherwise meet this definition are included.

COMMON VARIETY MINERALS. See salable minerals.

COVER. Vegetation used by wildlife for protection from predators (hiding) or for shelter (thermal).

COVER EFFECTIVENESS. Cover effectiveness reduces hunting impact upon the bull elk population, and meets both hiding cover and thermal cover requirements of the species.

CULTURAL RESOURCE. Evidence of human behavior.

DIATREME. A general term for a volcanic vent or pipe emplaced in rocks (usually flat-lying sedimentary rocks) by the explosive energy of gas-charged magmas.

DIVERSITY. The distribution and abundance of different plant and animal communities and species.

EDGES. Refers to any area where wildlife populations are generally highest because a variety of habitats are available in a relatively small area. Also, refers to the ecotome created where plant communities of structural conditions within a community come together.

EIS. Environmental Impact Statement.

ENDANGERED SPECIES. Plant or animal species identified by the Secretary of the Interior as endangered in accordance with the 1973 Endangered Species Act.

ENVIRONMENTAL IMPACT STATEMENT (EIS). A detailed written report for a proposal on which a significant impact or land allocation is anticipated.

FORAGE. Refers specifically to all browse and nonwoody plants that are available to livestock or game animals and used for grazing or harvested for feeding.

FORBS. Foot; a broadleaf herb other than grass. See forage, also.

FS. Forest Service.

FWS. Fish and Wildlife Service, a division of the U.S. Department of Interior.

GEOLOGIC FAVORABILITY. An estimate of potential for the occurrence of energy and nonenergy. The four categories of geologic favorability are:

> **VERY HIGH FAVORABILITY.** Areas where a number of geologic characteristics are present that indicate the occurrence of a given resource. Unfavorable characteristics are few or absent. At least some characteristics are diagnostic of a particular mineral deposits model. Information on past, present, and planned activity in the area supports or reinforces the area's geologic favorability.
>
> **HIGH FAVORABILITY.** Areas where a number of geologic characteristics are present that indicate the occurrence of a given structure.
>
> **MODERATE FAVORABILITY.** Areas where some geologic characteristics are present that are favorable for the occurrence of a given resource.

LOW FAVORABILITY. Areas where a few geologic characteristics favorable for the occurrence of a given resource are present.

HABITAT MODIFICATION. To cause or bring about a change to the natural place of abode of a plant or animal species.

HABITAT TYPE. An aggregation of all land areas potentially capable of producing similar plant communities at climax.

HIGH VALUE FISHERIES. Habitat that maintains outstanding populations of species of high interest to the State of Montana. Includes self-sustaining wild populations that maintain a high yield or represent an exceptional aesthetic scientific, economic, educational, or recreational value.

IDF&G. Idaho Department of Fish and Game.

IGBST. Interagency Grizzly Bear Study Team.

INTERMITTENT CREEKS. Drainages where streamflow occurs during wet weather, usually fifty percent of the year.

INHOLDING. A parcel of nonpublic land surrounded by public land.

ISSUE. A subject or question of widespread public interest identified through public participation.

KEROGEN. The solid bituminous mineraloid substance in oil shales which yields oil when the shales undergo destructive distillation.

LEASABLE MINERALS. Those minerals or materials subject to lease by the federal government. Includes oil and gas, coal, phosphate, sodium, potash, and oil shale.

LOCATABLE MINERALS. Minerals or materials subject to disposal and development through the Mining Law of 1872 (as amended). Generally includes metals such as gold and silver and other materials not subject to lease or sale (Some bentonites, limestones, talc, some zeolites, etc.).

MG/L. Milligram per liter.

MANAGEMENT FRAMEWORK PLAN. A planning decision document that establishes, for a given planning area, land use allocations, coordination guidelines for multiple use, and management objectives to be achieved for each class of land use or protection. An MFP is prepared in three steps: (1) resource recommendations, (2) impact analysis and alternative development, and (3) decision making. BLM plans developed after 1981 under an altered planning system will be called RMPs (Resource Management Plans).

MANAGEMENT PRESCRIPTION. A written direction for managing the condition or availability of land and associated natural resources.

MANAGEMENT PRIORITY SPECIES. A species that is protected by either national or state laws.

MASS WASTING. The downslope movement of rock debris. A general term for a variety of processes by which large masses of earth material are moved by gravity either slowly or quickly from one place to another.

MDFWP. Montana Department of Fish, Wildlife and Parks.

MITIGATE. To lessen the severity.

MMBF. Million Board Feet; measurement of 1,000,000 board feet of wood fiber volume, either in log form or after conversion into lumber.

MODERATE VALUE FISHERIES. Moderate habitat for highly valued species and/or substantial habitat for less highly valued species. (USDA, FWS 1980).

MONITORING PLAN. A systematic approach to observing, measuring and recording the operation of a management system during the planning period; the goal of monitoring is to detect significant deviation from planned direction, outputs or effects and initiate change as needed to assure planned results.

MULTIPLE USE. The management of all the various resources so that they are utilized in the combination that will best meet the needs of the American people.

NATIONAL FOREST LANDS. Lands administered by the Forest Service.

NONGAME. Species of animals which are not managed as a sport hunting resource.

NPS. National Park Service, a division of the U.S. Department of Interior.

NWR. National Wildlife Refuge.

OFF ROAD VEHICLE. Any vehicle capable of being operated off an established road or trail; e.g. motorbikes, four-wheeled drive vehicles and snowmobiles.

OLD GROWTH. A stand of trees that is past full maturity and showing decadence; the last stage in forest succession.

ORV. Off road vehicle.

PATENTED CLAIM. A claim on which title has passed from the federal government to the mining claimant under the 1872 mining law.

PERENNIAL CREEKS. Drainages where water flow persists ninety percent of the year in well-defined channels.

PINE BARK BEETLE. A tiny black insect that ranges in size from one-eighth of an inch to three-fourths of an inch. The beetle bores its way into the tree's cambium and cuts off its supply of food, thus killing the tree.

PLANNING CRITERIA. The factors used to guide development or revision of the resource management plan to ensure that it is tailored to the issue previously identified and to ensure that unnecessary data collection and analysis are avoided. Planning criteria are developed to guide the collection and use of inventory data and information, the analysis of the management situation, the design and formulation of alternatives, the estimation of the effects of alternatives, the evaluation of alternatives, and the selection of the preferred alternative.

POLICY. A guiding principle which is based on a specific decision or set of decisions.

PUBLIC LANDS. Lands administered by the Bureau of Land Management.

PUBLIC PARTICIPATION ACTIVITIES. Meetings, conferences, seminars, workshops, tours, written comments, response to survey questionnaires, and similar activities designed and held to obtain comments from the general public and specific publics.

RARE II. Roadless Area Review and Evaluation II.

RECREATION (Developed). That type of recreation that occurs where modifications (improvements) enhance recreation opportunities and accommodate intensive recreation activities in a defined area.

RECREATION (Dispersed). That type of recreation use that requires few, if any, improvements and may occur over a wide area. This type of recreation involves activities related to roads and trails. The activities do not necessarily take place on or adjacent to a road or trail, only in conjunction.

RECREATION OPPORTUNITY SPECTRUM. A continuum used to characterize recreation opportunities in terms of setting, activity, and experience opportunities. The spectrum contains six classes as shown in the chart below:

Primitive.	Semi-Primitive Nonmotorized.	Semi-Primitive Motorized.	Roaded Natural.	Rural....	Modern Urban.

RECREATION VISITOR DAY. One visitor day equals 12 hours (one person for 12 hours, or 12 people for 1 hour, or any combination thereof).

RIPARIAN. Land areas which are directly influenced by water. They usually have visible vegetative or physical characteristics showing this water influence. Streamsides, lake borders, or marshes are typical riparian areas.

ROADLESS AREA REVIEW AND EVALUATION II. A natural program with the purpose of identifying areas suitable for wilderness and making recommendations to Congress regarding their designation.

ROTATION PERIOD. The period in years it takes to convert a natural old growth forest from its existing state to one of healthy young growing trees.

RVD. Recreation Visitor Day.

SALABLE MINERALS. Common variety materials (sand and gravel, decorative stone, pumice, etc.) which are disposed of by sale by the federal government.

SCORP. (Montana) Statewide Comprehensive Outdoor Recreation Plan.

SCS. Soil Conservation Service.

SECURITY COVER (Hiding Cover). The vegetation and topographic complex capable of essentially hiding an animal from view.

SENSITIVE SPECIES. Those plant or animal species which are susceptible or vulnerable to activity impacts or habitat alterations; require special consideration; can be easily crowded out by more dominant animals or plants or human disturbance.

SHEEP STATION. The sheep experimental station located in the Centennial Mountains and managed by the Agricultural Research Service.

SIMO TRACTS. Tracts which are leased through the simultaneous oil and gas lottery program.

SITUATION 2 GRIZZLY BEAR HABITAT. Suitable habitat in which grizzly bears are known or highly suspected to occur but about which there is inadequate information to classify the habitat as necessary for recovery of the species.

STAND. An aggregation of trees or other growth occupying a specific area and sufficiently uniform in composition (species), age arrangement, and condition as to be distinguishable from other growth on adjoining areas.

SUITABLE FOREST LAND. Forest land where technology is available that will ensure timber production from the land without irreversible resource damage to soils, productivity, or watershed conditions. There is reasonable assurance that such lands can be adequately restocked as provided in CFR 219.13 (h) (3).

SUITABILITY. The appropriateness of applying certain resource management practices to a particular area of land, as determined by an analysis of the economic and environmental consequences and the alternative uses foregone. A unit of land may be suitable for a variety of individual or combined management practices.

SUSTAINED YIELD. The achievement and maintenance in perpetuity of a high-level annual or regular periodic output of various renewable resources without impairment of the productivity of the land. Sustained yield management, therefore, implies continuous production so planned as to achieve at the earliest practical time a balance between increment and cutting.

TEMPERATURE INVERSION. A meteorological condition where temperature increases with altitude. A stable condition where mixing is dampened. In the intermountain west, inversions occur very frequently.

THERMAL COVER. Cover used by animals to ameliorte effects of weather; for elk, a stand of coniferous trees 40 feet or more trail with an average crown closure of 70 percent or more.

THREATENED AND ENDANGERED SPECIES. A species or subspecies of animals or plants whose prospects of survival and reproduction are in immediate jeopardy, or likely to become so within the foreseeable future. Threatened species are identified by the Secretary of Interior in accordance with the 1973 Endangered Species Act.

TRANSITORY RANGE. Land areas that are suitable for livestock grazing use on a temporary basis over a period of time.

UPLIFT. Elevation of any extensive part of the earth's surface relative to some other parts.

U.S. United States.

USDA. United States Department of Agriculture.

USDI. United States Department of Interior.

VISITOR DAY. The use of an area for a total of 12 person hours by one or more people, either continuously or over several visits.

VISUAL RESOURCE. The composite of basic terrain, geologic features, water features, water features, vegetative patterns, and land use effects that typify a land unit and influence the visual appeal the unit may have for visitors.

WATER QUALITY STANDARDS. Quantitative or qualitative criteria for chemical, physical and biological characteristics that are established for the purpose of providing water that is suitable for specific uses.

WATERSHED. A drainage basin feeding a stream, river, or lake.

WET AREAS. Often referred to as moist sites, they are very important components of elk summer range. These sites, often occurring at the heads of drainages, may be wet sedge meadows, bogs, or seeps. Sites near water are important because the forage they produce are highly nutritious and heavily utilized by elk.

WILDERNESS. Under the 1964 Wilderness Act, wilderness is undeveloped federal land retaining its primeval character and influence without permanent improvements or human habitation. It is protected and managed so as to preserve its natural conditions which generally appear to have been affected by the forces of nature with the imprints of human activity substantially unnoticeable; has outstanding opportunities for solitude or a primitive recreation; has at least 5,000 acres or is of sufficient size to make practical its preservation, enjoyment, and use in an unimpaired condition; and may contain features of scientific, educational, scenic, or historical value as well as ecologic interest.

WITHDRAWAL. Segregation and dedication of the lands either immediately or prospectively for some specific public use or purpose. Withdrawals may bar all uses of the land or they may bar some and allow others.

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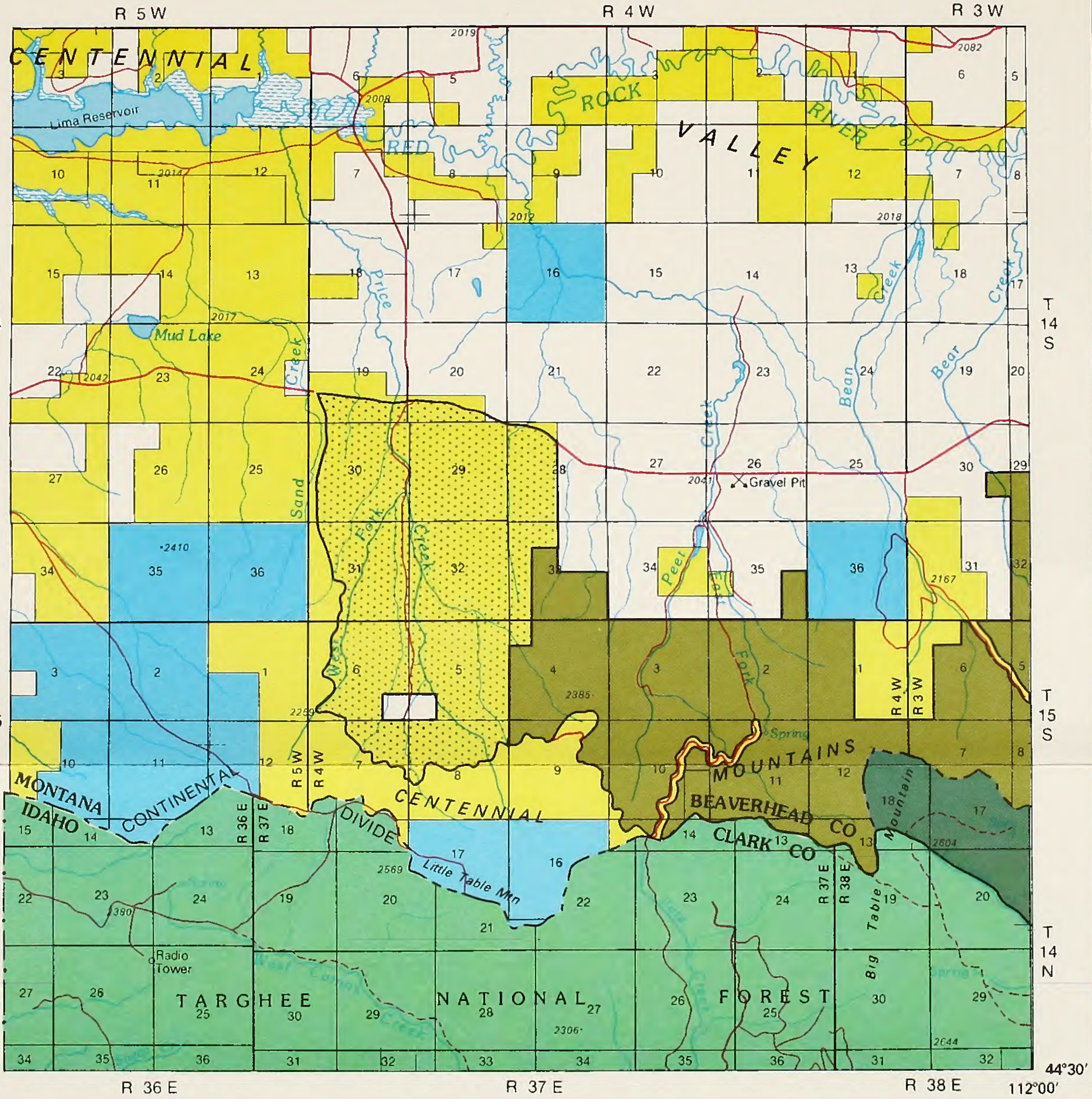
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Centennial Mountains Wilderness Study Area

1st Continental Exchange Inventory Unit

NORTH

🟨	Public Lands	▨	1st Continental Exchange
🟩	National Forest	—	Major Road
🟦	State Lands	—	Minor Road
⬜	Private Lands	🟫	Wilderness Study Area

0 1 2 3 Miles

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Scale

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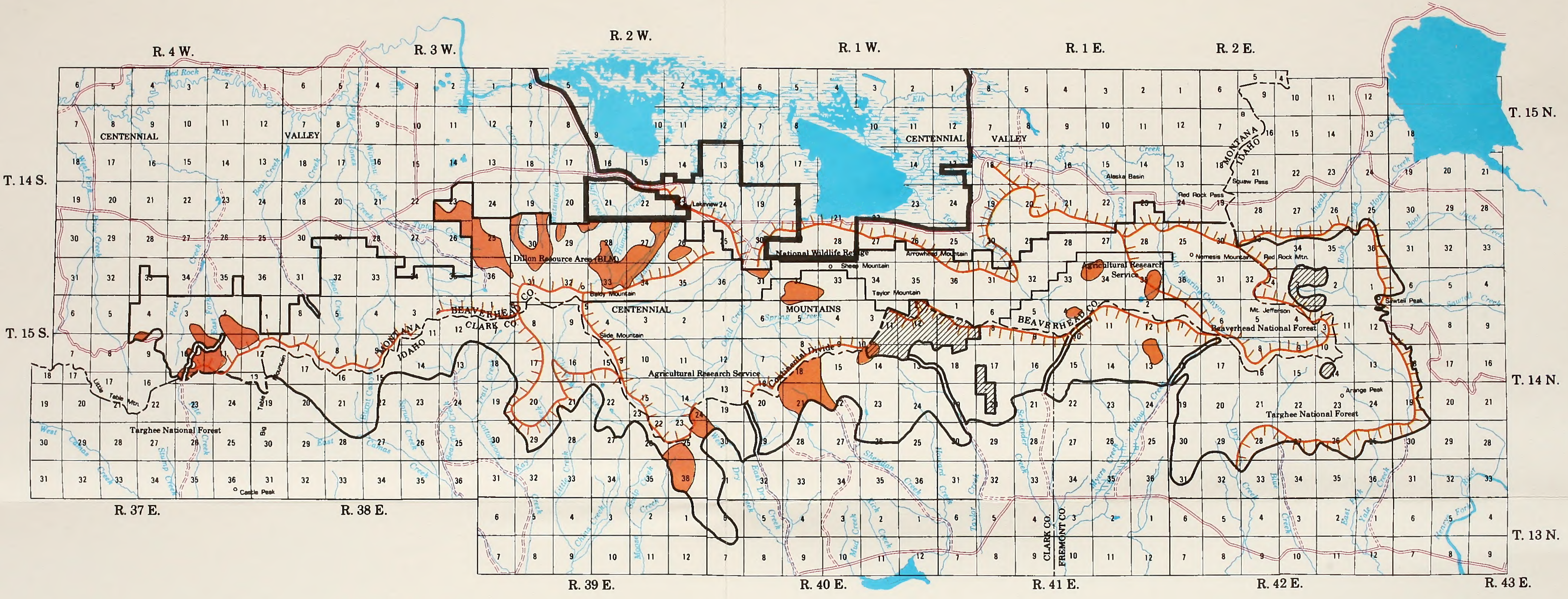
Centennial Mountains Wilderness Study Area Topographic Vehicle Barriers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Squaw Pass
Nemesis Mountain
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Blue Creek
East Fork
Yale Creek
Hotel Creek
Hope Creek
Boot Creek
Rock Creek
Duck Creek
Henrys Fork

Topographic Vehicle Barrier

🟧 Unstable Soils

Wilderness Study Area Boundary

Major Road

Minor Road

Trail

▨ Areas Excluded from Study

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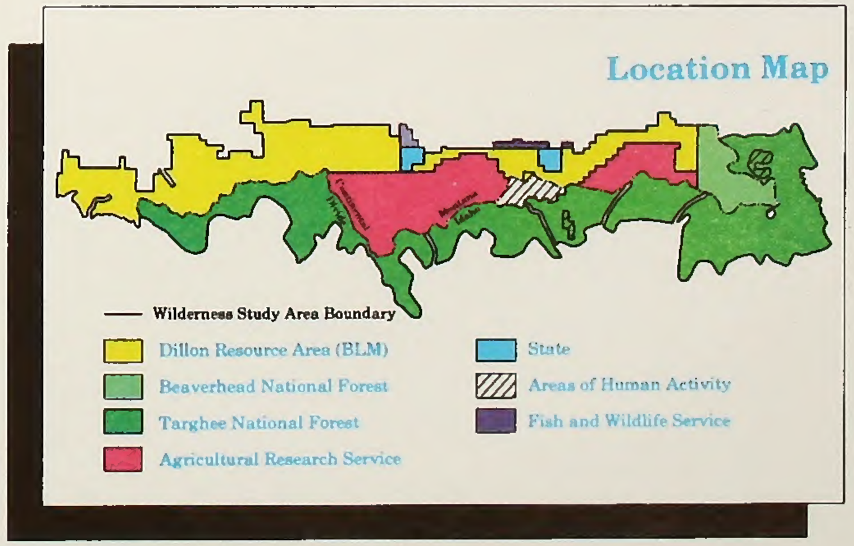
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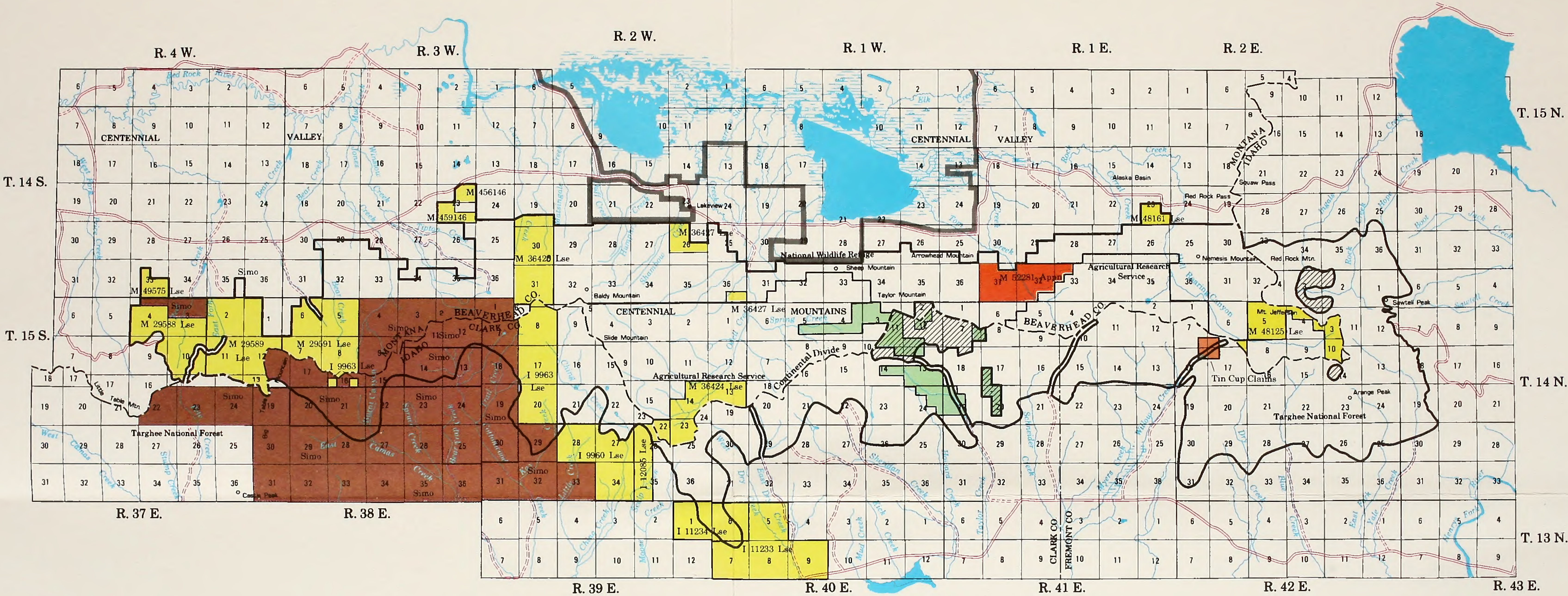
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Mt. Jefferson
Sawtell Peak
Arange Peak
Table Mtn
Castle Peak
Red Rock River

🟨 Oil and Gas Lease

🟫 Oil and Gas Simultaneous

🟩 Phosphate Lease

🟥 Oil and Gas Lease Application

🟧 Mining Claims

—— Wilderness Study Area Boundary

—— Major Road

====== Minor Road

------ Trail

▨ Areas Excluded from Study

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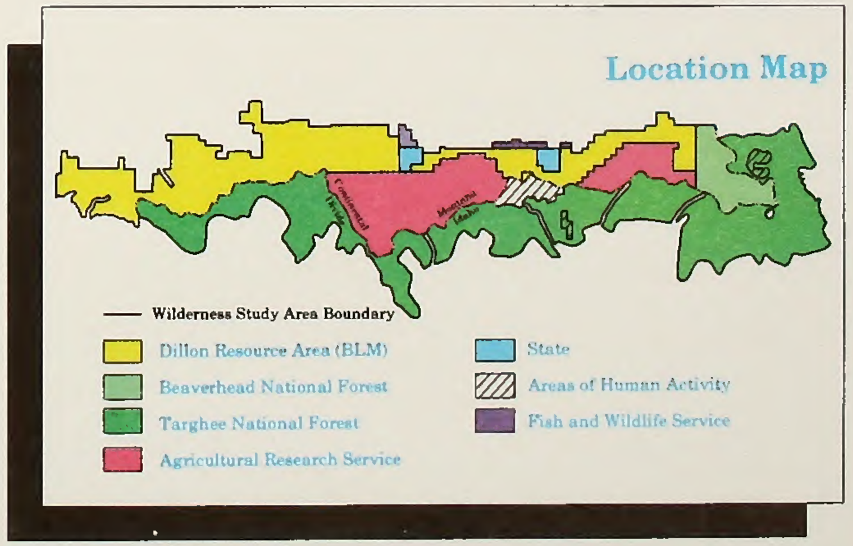
Centennial Mountains Wilderness Study Area Mineral Leasing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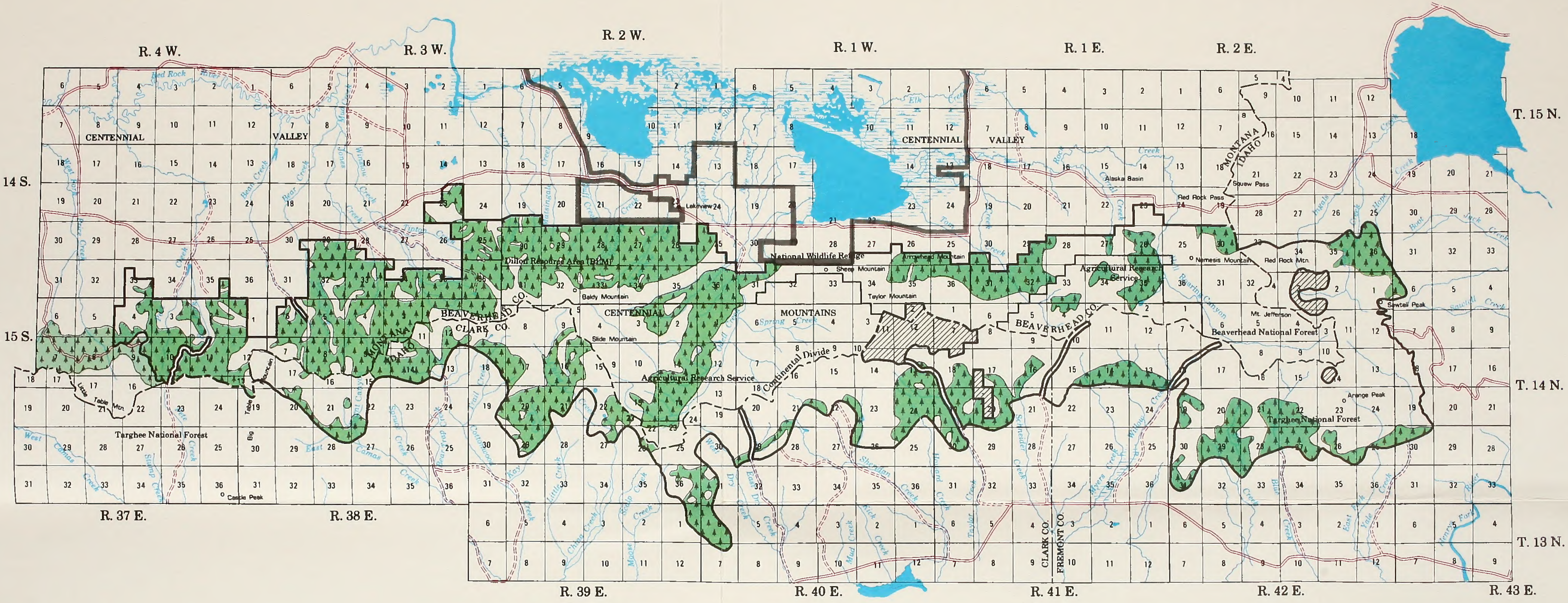
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Arange Peak
Red Rock
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East Camas
Camas
Sheridan
Hell Roaring Canyon
Henrys Fork

🟩 Suitable Commerical Forest Lands

🟩 Suitable Commercial Forest Lands Outside Study Area

—— Wilderness Study Area Boundary

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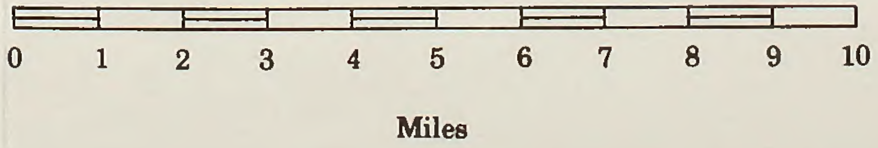
▨ Areas Excluded from Study

Centennial Mountains Wilderness Study Area Suitable Timber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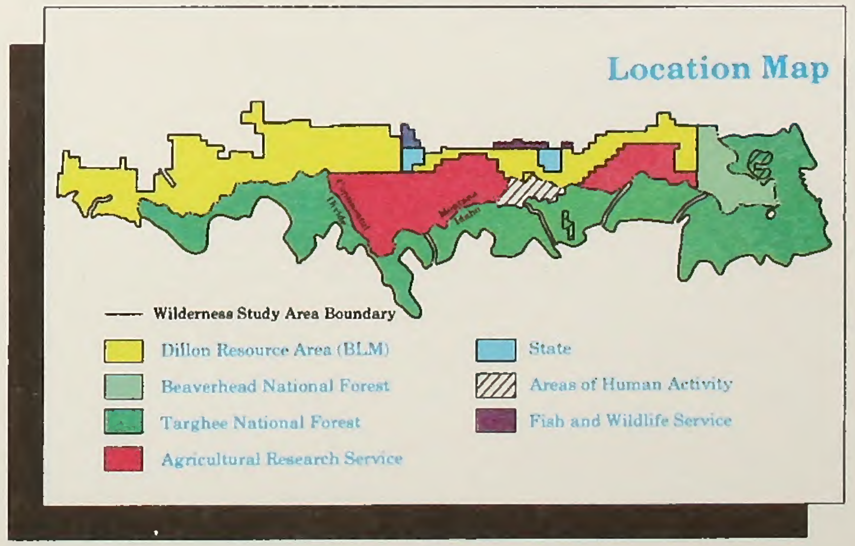
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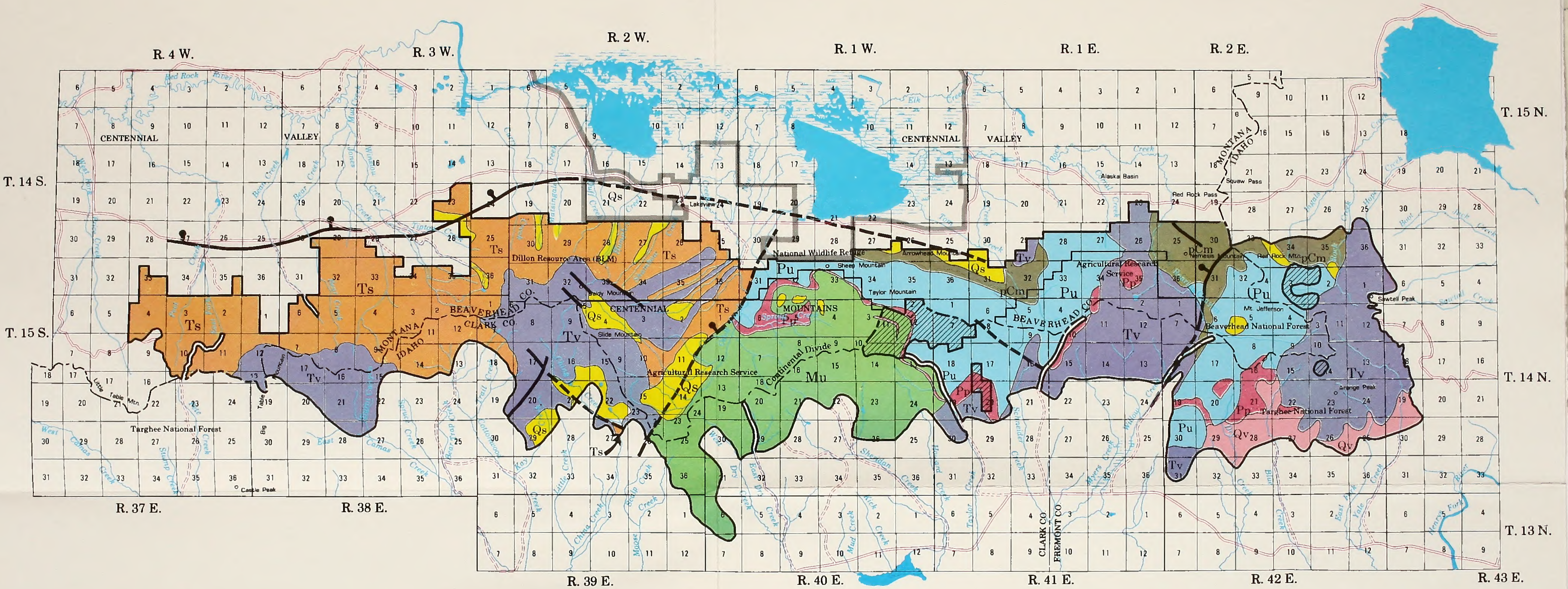
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Sawtell Peak
Beaverhead National Forest
Targhee National Forest
Orange Peak
Table Mtn.
Castle Peak
CLARK CO
FREMONT CO
Ts
Qs
Tv
Mu
Pu
Pp
pCm
Qv

Centennial Mountains Wilderness Study Area Geology

Sedimentary Units

Qs	Quaternary Sediments — includes alluvium, colluvium, landslide, earthflows, till, and Pediment Deposits
Ts	Tertiary Sediments — primarily consist of the Beaverhead fm.
Mu	Mesozoic Sediments
Pp	Permian Phosphoria — includes phosphate unit
Pu	Paleozoic Sediments
pCm	Precambrian Metamorphic Units

Volcanic Units

Qv	Quaternary Volcanics — associated with volcanic rocks of the Yellowstone Caldera
Tv	Tertiary Volcanics — includes a wide range of textures and compositions
┴	Fault — symbol on downthrown side
- - - -	Fault dashed where approx.

——	Wilderness Study Area Boundary
——	Major Road
======	Minor Road
------	Trail
▨	Areas Excluded from Study

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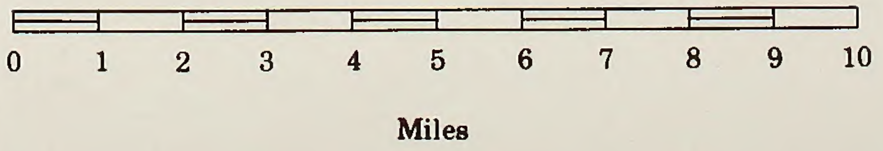
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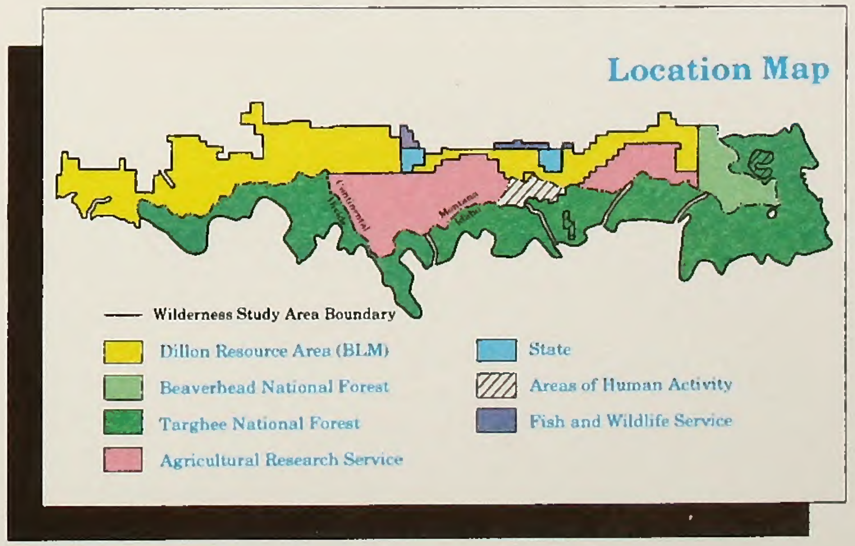
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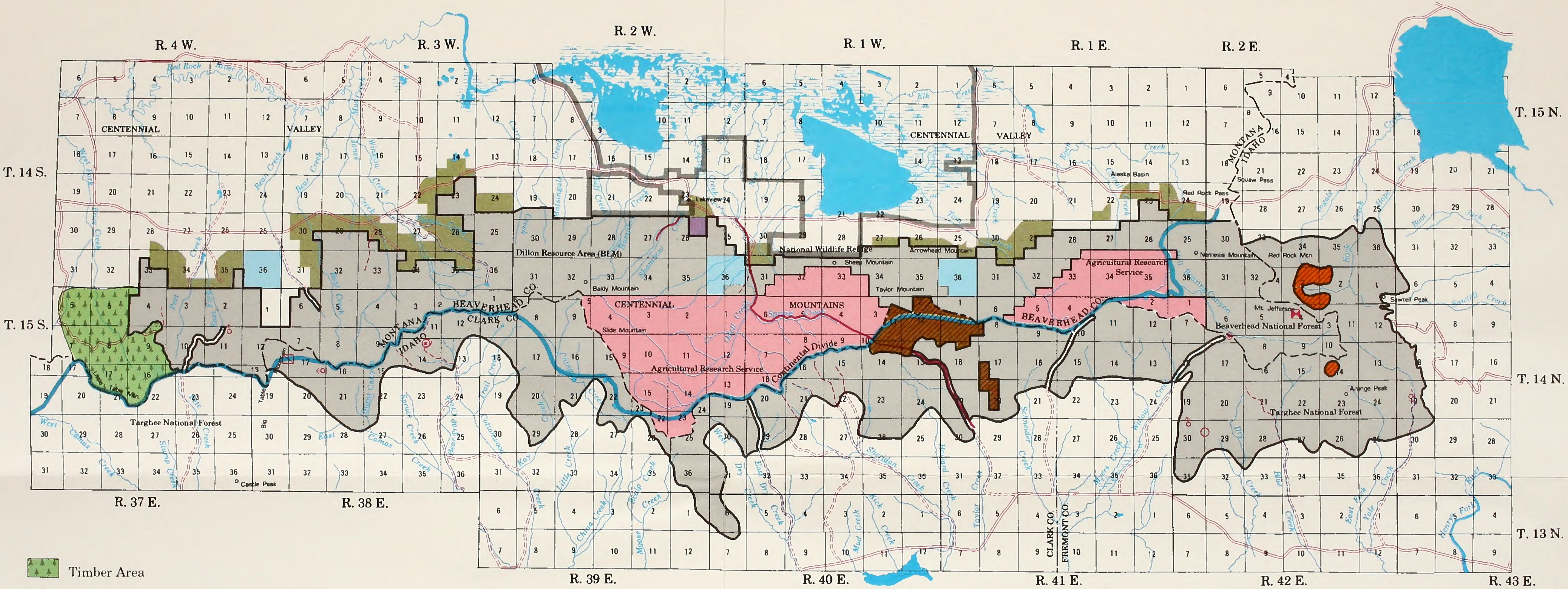
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R. 40 E.
R. 41 E.
R. 42 E.
R. 43 E.
CENTENNIAL
VALLEY
CENTENNIAL
VALLEY
Red Rock River
Lakeview
National Wildlife Refuge
Dillon Resource Area (BLM)
Sheep Mountain
Arrowhead Mountain
Baldy Mountain
Taylor Mountain
Agricultural Research Service
Alaska Basin
Red Rock Pass
Squaw Pass
Nemesis Mountain
Red Rock Mtn.
Mt. Jefferson
Sawtell Peak
Beaverhead National Forest
BEAVERHEAD CO.
CLARK CO.
MONTANA
IDAHO
CENTENNIAL
MOUNTAINS
Slide Mountain
Agricultural Research Service
Continental Divide
Targhee National Forest
Targhee National Forest
Antelope Peak
Castle Peak
CLARK CO.
FREMONT CO.
West Camas Creek
Stump Creek
East Camas Creek
Spring Creek
Little Creek
Ching Creek
Moose Creek
Dry Creek
Sheridan Creek
Kick Creek
Taylor Creek
Schneider Creek
Myers Creek
Willow Creek
Blue Creek
Yale Creek
Henrys Fork

Timber Area

Vegetative Spraying Area

○ Vegetative Reseeding

Ski Lift Development

State Inholding

Phosphate Mining Area

⊙ Abandoned Coal Mine

Agricultural Research Service

◈ Building Stone Mine

Watershed Contour Furrowing

Soil Conservation Service Snow Course

Developed Spring

☒ Abandoned Gold Mine

Private land within 1/2 miles of Wilderness Boundary

Centennial Mountains Wilderness Study Area

Note: All will be included except Impact Areas

Wilderness Study Area Boundary

Continental Divide Trail

Major Road

Snowmobile Route

Minor Road

Vehicle Way within Wilderness Boundary

Trail

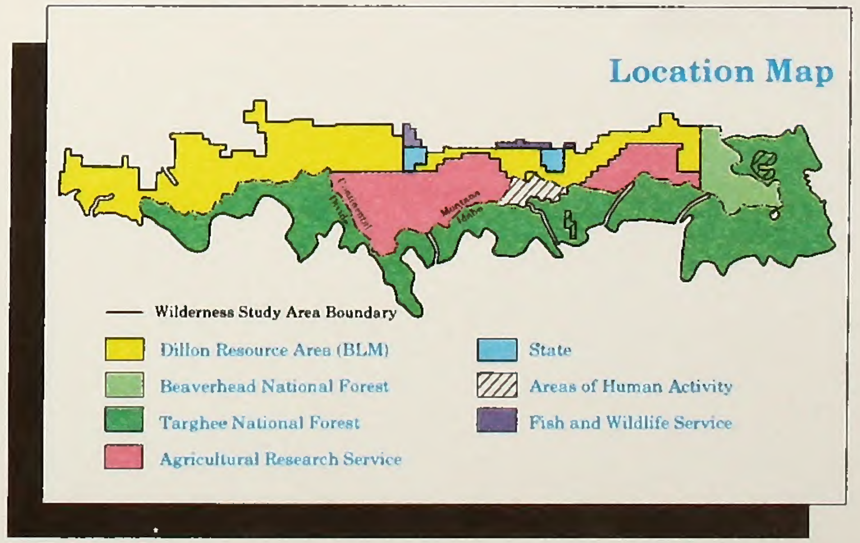
▨ Areas Excluded from Study

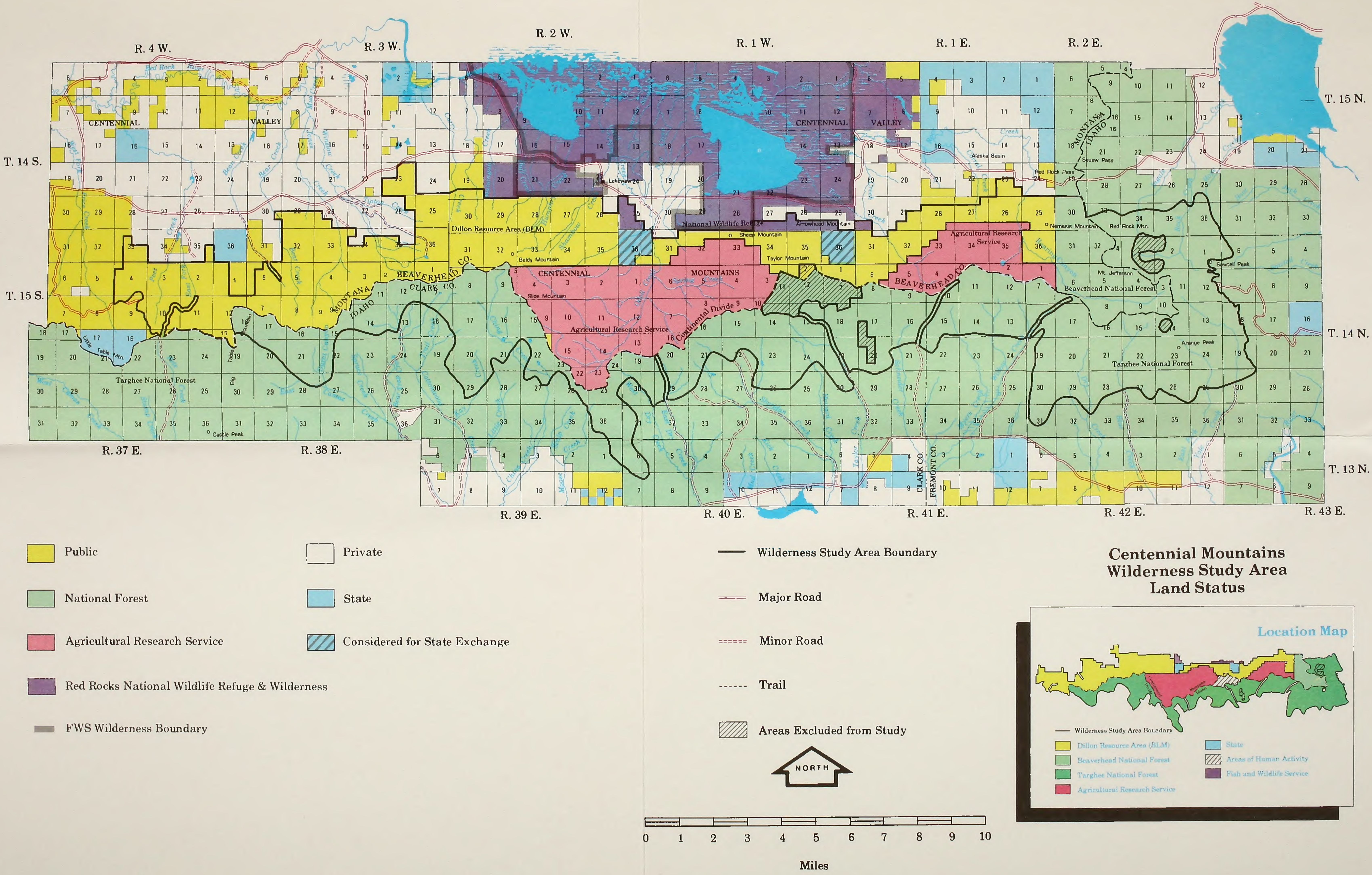
NORTH

0 1 2 3 4 5 6 7 8 9 10

Miles

Centennial Mountains Wilderness Study Area Existing Impacts to Wilderness Values


Location Map
Wilderness Study Area Boundary
Dillon Resource Area (BLM)
Beaverhead National Forest
Targhee National Forest
Agricultural Research Service
State
Areas of Human Activity
Fish and Wildlife Service


R. 4 W.
R. 3 W.
R. 2 W.
R. 1 W.
R. 1 E.
R. 2 E.
T. 15 N.
T. 14 S.
T. 15 S.
T. 14 N.
T. 13 N.
R. 37 E.
R. 38 E.
R. 39 E.
R. 40 E.
R. 41 E.
R. 42 E.
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CENTENNIAL
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Targhee National Forest
Arange Peak
Table Mtn
Targhee National Forest
Castle Peak
CLARK CO.
FREMONT CO.
Public
Private
National Forest
State
Agricultural Research Service
Considered for State Exchange
Red Rocks National Wildlife Refuge & Wilderness
FWS Wilderness Boundary
Wilderness Study Area Boundary
Major Road
Minor Road
Trail
Areas Excluded from Study
NORTH
0
1
2
3
4
5
6
7
8
9
10
Miles
Location Map
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Dillon Resource Area (BLM)
Beaverhead National Forest
Targhee National Forest
Agricultural Research Service
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Centennial Mountains Wilderness Study Area Land Status